

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance-2.1

Name of Management Organization : **Bebunga POM – PT Langgeng Muaramakmur Subsidiary of Sime Darby Plantation Berhad**
 Plantation Name : **Bebunga Estate, Bakau Estate and Sungai Cengal Estate**
 Location : **Binturung Village, Pamukan Utara Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia**
 Certificate Code : **MUTU-RSPO/014**
 Date of Initial Registration : **16 March 2012**
 Date of Last Issue : **30 November 2022** Date of License Issue : **16 December 2022**
 Date of Certificate Expiry : **29 November 2027** Date of License Expiry : **29 November 2024**

Assessment	Assessment Date	PT. Mutuagung Lestari Tbk Auditor	Reviewed by	Approved by
ASA-2.1	11 – 15 September 2023	Octo HPN Nainggolan (Lead Auditor Witnessing), Septian Maulana (Lead Auditor Witnessed), Rindu Galih Rezza Rachmansyah, I Wayan Sudi Antara and Muhammad Yusuf Safardan	Rahmat Abdiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2.1	27 December 2023

TABLE OF CONTENT
FIGURE

Figure 1. Location Map of PT Langgeng Muaramakmur – Bebunga POM	1
Figure 2. Operational Map of PT Langgeng Muaramakmur – Bebunga POM	2
Abbreviations Used	3

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1	Assessment Standard Used	5
1.2	Organization Information	5
1.3	Type of Assessment	5
1.4	Location of Mill and Plantations	5
1.5	Description of Area Statement	6
1.6	Planting Year and Cycle	6
1.7	Description of Mill and Supply Base	7
1.8	Estimate Tonnage of Certified Product	8
1.9	Other Certifications	9
1.10	Time-Bound Plan	9

2.0 ASSESSMENT PROCESS

2.1	Assessment Team	19
2.2	Assessment Methodology, Assessment Process and Locations of Assessment	20
2.3	Stakeholder Consultation and Stakeholders Contacted	22
2.4	Determining Next Assessment	23

3.0 ASSESSMENT FINDINGS

3.1	Summary of Assessment Report of the RSPO Certification	24
3.2	Conformity Checklist of Certificate and Logo Use	86
3.3	Summary of RSPO Partial Certification	87
3.4	Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	97
3.5	Summary of Arising Issues from Public and Auditor Verification	123

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1	Formal Signing of Assessment Findings	126
-----	---------------------------------------	-----

APPENDICES

1.	List of Stakeholders Contacted in the RSPO Certification Process	127
2.	Assessment Program	129

Figure 1. Location Map of PT Langgeng Muaramakmur – Bebunga POM

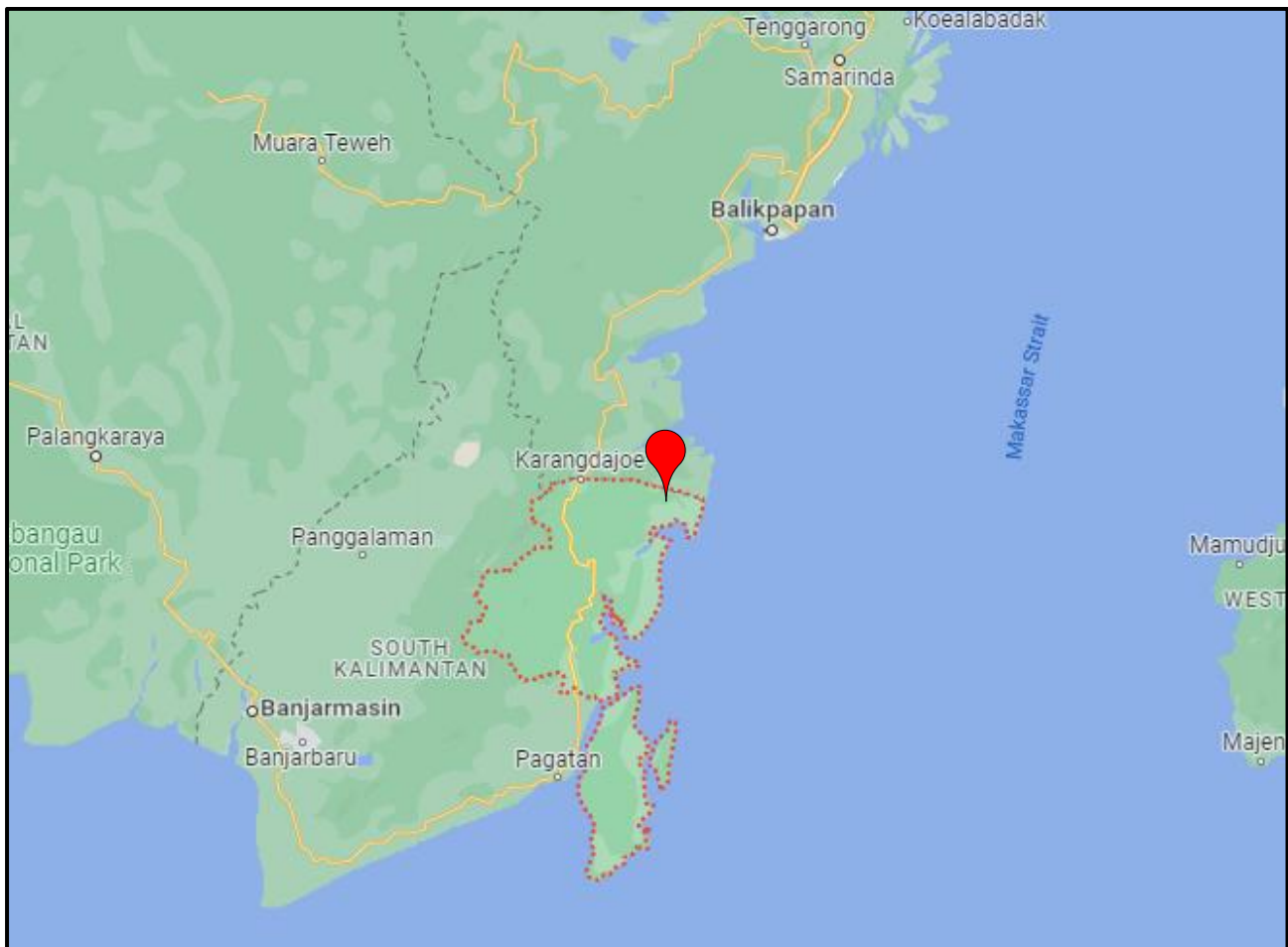
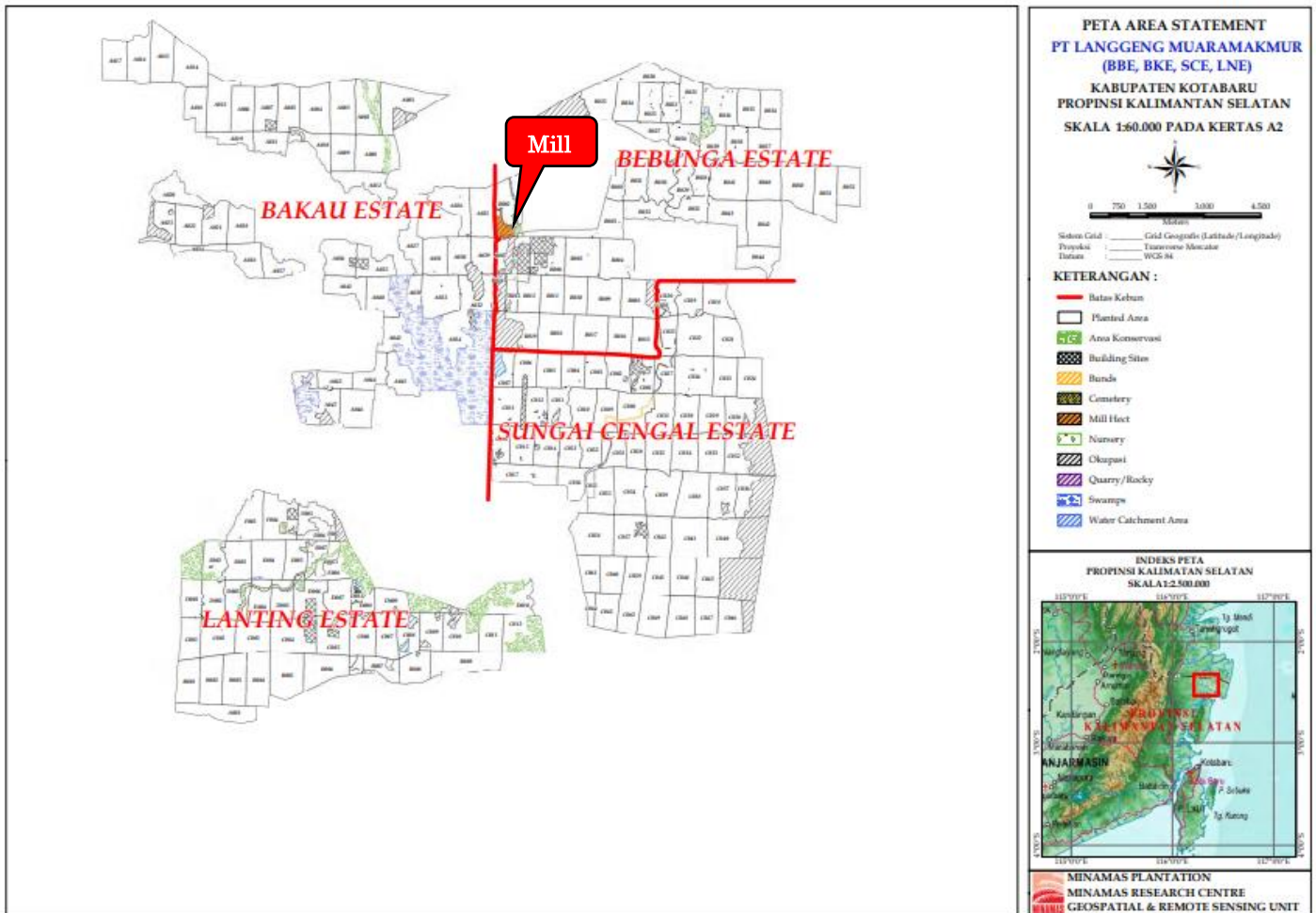


Figure 2. Operational Map of PT Langgeng Muaramakmur – Bebunga POM



*Lanting Estate is excluded of certification scope.

Abbreviations Used

BBE	:	Bebunga Estate
BBF	:	Bebunga Factory
BKE	:	Bakau Estate
BMS	:	Block Manuring System
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial (Social Security Agency)</i>
BPN	:	National Land Agency
BSK	:	Bina Swadaya Karya (cooperative)
BSS	:	Block Spraying System
C1R2	:	Cutter, Carrier, and Picker
CB	:	Certification Body
CEO	:	Chief Executive Officer
CLA	:	Collective <i>Labour</i> Agreement
COBC	:	Code of Business Conduct
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	<i>Commanditaire Vennootschap</i>
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health and Safety
FFB	:	Fresh Fruit Bunch
FR	:	Frequency Rate
FSPMP	:	<i>Federasi Serikat Pekerja Minamas Plantation</i>
GHG	:	Green House Gases
GM	:	General Manager
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha / Land Use Permit</i>
HIRAC	:	Hazard Identification Risk Assessment & Control
HPO	:	Head Plantation Operational
HRM	:	Human Resource Management
IDR	:	Indonesian Rupiah
IOM	:	Internal Office Memo
IPM	:	Integrated Pest Management
ISO	:	International Organization for Standardization
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	Business Permit
Jamsostek	:	Jaminan Sosial Tenaga Kerja (employees' social security)
KER	:	Kernel Extraction Rendement
KKPA	:	<i>Koperasi Kredit Primer Anggota (Cooperative Credit Scheme)</i>
KSP	:	Kalimantan Selatan Pamukan
KTU	:	<i>Kepala Tata Usaha (Head of Administration)</i>
LC	:	Land Clearing
LKS	:	<i>Lembaga Kerjasama (Cooperation Institution)</i>
LKUP	:	Laporan Kegiatan Usaha Perkebunan (plantation activity business report)
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis

MRC	:	Minamas Research Center
MT	:	Metrik Ton
MUSREMBANG	:	<i>Musyawarah Perencanaan Pembangunan Desa</i>
NPV	:	<i>Nuclear Polyhedrosis Virus</i>
OER	:	Oil Extraction Rendement
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health & Safety
OSH	:	Occupational Safety & Health
P2K3	:	<i>Panitia Pelaksana Kesehatan dan Keselamatan Kerja (OHS Guiding Committee)</i>
PIC	:	Person In Charge
PJK3	:	<i>Perusahaan Jasa Keselamatan dan Kesehatan Kerja (Occupational Safety and Health Service Company)</i>
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama (Collective Labour Agreement)</i>
PKO	:	Palm Kernel Oil
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu (Temporary Appointment Work Agreement)</i>
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu (Indefinite Contract Agreement)</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	personal protective equipment
PSD	:	Plantation and Services Department
PSQM	:	Plantation Sustainability Quality Management
PT LMR	:	PT Langgeng Muaramakmur
QC	:	Quality Control
RaCP	:	Remediation and Compensation Procedure
RKL – RPL	:	<i>Rencana Kelola Lingkungan / Rencana Pemantauan Lingkungan (Environmental Management Plan / Environmental Monitoring Plan)</i>
SCCS	:	Supply Chain Certification System
SCE	:	Sungai Cengal Estate
SDP	:	Sime Darby Plantation
SGM	:	Senior General Manager
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i>
SOP	:	Standard Operational Procedure
SOU	:	Strategic Operation Unit
SPK	:	<i>Surat Perjanjian Kerja (Work Agreement)</i>
SR	:	Severity Rate
UHL	:	<i>Upah Hidup Layak (Decent Living Wages)</i>
UKL - UPL	:	<i>Upaya Kelola Lingkungan / Upaya Pemantauan Lingkungan (Environmental Management Efforts / Environmental Monitoring Efforts)</i>
UMK	:	<i>Upah Minimum Kabupaten (District Minimum Wage)</i>
VCBC	:	Vendor Code of Business Conduct
VOPs	:	Voluntary Oil Palm Seedling
WLTk	:	<i>Wajib Lapor Ketenagakerjaan</i>
WTP	:	Water treatment Plant
WWTP	:	Waste Water Treatment Plan

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 and Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. 	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	PT Langgeng Muaramakmur, subsidiary of Sime Darby Plantations bhd	
1.2.2	Contact person	Alagendran Maniam	
1.2.3	Organization address and site address	RSPO registered company: No 2, Plantation Tower Jalan PJU 1A/7 Petaling Jaya, Malaysia 47301 Liaison Office: The Plaza Lt. 36, Jl MH Thamrin Kav. 28-30 Jakarta 10350	
1.2.4	Telephone	+62-21-29926000	
1.2.5	Fax	+62-21-29922686	
1.2.6	E-mail	alagendran.maniam@sime-darbyplantation.com	
1.2.7	Web page address	http://www.sime-darbyplantation.com/	
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head of Sustainability and Quality Management Sime Darby Plantation Berhad)	
1.2.9	Registered as RSPO member	1-0008-04-000-00 – 6 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	One (1) Palm Oil Mill and three (3) supply bases: Bebunga POM, Bebunga Estate, Bakau Estate, Sungai Cengal Estate <i>*There is a reduction in the scope of certification from the previous assessment because the area of the Lanting Estate is still within one HGU move its supply base.</i>	
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
	Bebunga POM	Binturung Village, Pamukan Utara Sub	

		District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 02° 22' 25"	E 116° 19' 47"	
1.4.2	Location of Certification Scope of Supply Base				
	Name of Supply Base	Location	Coordinate		
			Latitude	Longitude	
	Bebunga Estate	Binturung Village, Pamukan Utara Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 02° 23' 01"	E 116° 20' 04"	
	Bakau Estate	Binturung Village, Pamukan Utara Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 02° 25' 14"	E 116° 19' 42"	
	Sungai Cengal Estate	Binturung Village, Pamukan Utara Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 02° 24' 22"	E 116° 21' 47"	
1.5	Description of Area Statement				
1.5.1	Tenure		HGU: 16,990.75 Ha (3,244.65 Ha is excluded from this scope-Lanting Estate)* Total scope of this certificate is 13,746.10 Ha - ha		
	• State				
	• Community				
1.5.2	Area Statement				
		Bebunga Estate	Bakau Estate	Sungai Cengal Estate	Total (ha)
	Total area	3,957.34	4,814.56	4,974.20	13,746.10
	Mature area	2,347.73	2,494.47	2,596.51	7,438.71
	Immature area	636.79	732.80	1,647.00	3,016.59
	Road	155.23	225.33	105.26	485.82
	Building	107.98	28.28	31.63	167.89
	Mill	32.42	-	-	32.42
	Swamp, Sleeve, Hill and River Boundary	80.32	597.57	41.32	719.21
	Enclave (Permanent)	86.98	425.01	314.10	826.09
	*Enclave (Non Permanent)	30.61	201.80	-	232.41
	Nursery	21.49	-	-	21.49
	Other (Bulking, Air Strip)	457.79	109.30	221.96	789.05
	*Community area inside HGU which not willing to compensate				
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (ha)			Total (ha)
		Bebunga	Bakau	Sungai Cengal	

		Estate	Estate	Estate				
	1994	57.92	-	-	57.92			
	1995	88.48	-	-	88.48			
	1996	152.55	150.18	-	302.73			
	1997	509.95	732.84	-	1,242.79			
	1998	77.19	-	100.54	177.73			
	1999	-	-	84.06	84.06			
	2000	-	-	121.19	121.19			
	2005	-	-	228.93	228.93			
	2006	-	-	113.23	113.23			
	2007	-	-	410.78	410.78			
	2013	-	109.91	180.10	290.01			
	2014	197.07	305.86	149.13	652.06			
	2015	212.58	276.69	165.91	655.18			
	2016	394.52	583.42	424.66	1,402.60			
	2017	267.66	-	228.57	496.23			
	2018	266.98	164.73	72.20	503.91			
	2019	122.82	170.84	317.21	610.87			
	Sub Total Mature Area	2,347.73	2,494.47	2,596.51	7,438.71			
	2020	165.02	156.00	-	32.02			
	2021	186.62	-	658.80	845.42			
	2022	-	331.74	592.24	923.98			
	2023	285.15	245.06	395.96	926.17			
	Sub Total Immature Area	636.79	732.80	1,647.00	3,016.59			
	TOTAL	2,984.52	3,227.27	4,243.51	10,455.30			
1.6.2	New Planting area after January 2010			- ha				
1.6.3	Planting Cycle			2 nd 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 Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	
	Bebunga	60	138,024	29,228	21.18	5,915	4.29	
	*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 (ton/year)	Yield (ton/ha/year)	Supplied to Mill FFB (ton/year)		%
	Bebunga Estate	3,957.34	2,347.73	51,437	21.91	51,437	100	
	Bakau Estate	4,814.56	2,494.47	46,134	18.49	46,134	100	
	Sungai Cengal Estate	4,974.20	2,596.51	36,425	14.03	36,425	100	
	TOTAL	13,746.10	7,438.71	133,996	18.01	133,996	100	
	*Production data source from September 2022 to August 2023							
1.7.3	FFB description from other source							

	Name of sources/Organization (RSPO certified / non-certified)	Type of Organization	Number of Smallholders	Production Area (ha)	Supplied to Mill			
					FFB (ton/year)			
	KKPA Sungai Cengal (RSPO Certified)	Jeruju Villager, Batu Engau Sub District, Sigendang Village Batu Engau Sub District, Paser Regency, Kalimantan Timur Province	165	341.69	3,973			
	TOTAL				3,973			
	*Production data source from September 2022 to August 2023							
1.7.4	Product categories		FFB, CPO, PK					
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (Ton)		Actual Certified Volume from September 2022 – August 2023 (Ton)			
	FFB Processed		150,421		137,968.50			
	CPO Production		35,180		29,227.63			
	Palm Kernel (PK) Production		6,737		5,914.59			
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year (September 2022 – August 2023) (MT)					
	CSPO sold as RSPO certified product		611.17					
	CSPK sold as RSPO certified product		5,574.01					
	CSPO sold under another scheme		-					
	CSPK sold under another scheme		-					
	CSPO sold as conventional		28,397.61					
	CSPK sold as conventional		-					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (ha)	Production Area (ha)	FFB (tones/year)	Yield (tones/ha/year)			
	Bakau Estate	3,957.34	2,347.73	48,000.00	20.45			
	Bebunga Estate	4,814.56	2,494.47	54,000.00	21.65			
	Sungai Cengal Estate	4,974.20	2,596.51	38,000.00	14.64			
	TOTAL	13,746.10	7,438.71	140,000.00	18.82			
	*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO Out put (tones)	Extraction (%)	Palm Kernel Out put (tones)	Extraction (%)	Supply Chain Module
	Bebunga	60	140,000	30,000	21.43%	6,000	4.29%	IP
	*Projected CSPO and CSPK production for 12 months of certificate							

1.9	Other Certifications					
	ISO 9001:2008			-		
	ISO 14001: 2004			-		
	OHSAS 18001:2007			-		
	ISCC			-		
	Others			-		
1.10	Time Bound Plan					
1.10.1	Time Bound Plan for Other Management Units					
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	Mill	Time bound				
		INDONESIA				
1	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and Kotawaringin Barat District, Kalimantan Tengah Province	Certified
			Seruyan	2010		Certified
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District, Riau Province	Certified
			Manggala 2	2010		Certified
			Manggala 3	2010		Certified
3	Bukit Ajong PT. Sedjahtera Indo Agro	2010	West	2010	Sanggau District, Kalimantan Barat Province	Certified
			West (HGU on process)	2024		-
			East	2010		Certified
			East (HGU on process Sei Mawang)	2024		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District, Riau Province	Certified
			Pinang Sebatang	2011		Certified
			Pinang Sebatang 448 Ha	2024		-
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District, Sumatera Selatan Province	Certified
			Bukit Pinang	2012		Certified
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and Kotawaringin Timur District, Kalimantan Tengah Province	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai.	2011	Alur Dumai	2011	Rokan Hilir District,	Certified

	PT Lahan Tani Sakti				Riau Province	
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indragiri Hilir District, Riau Province	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indragiri Hilir District, Riau Province	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District, Kalimantan Selatan Province	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District, Kalimantan Selatan Province	Certified
12	Gunung Aru. PT Bersama Sejahtea Sakti	2011	Gunung Aru	2011	Kotabaru District, Kalimantan Selatan Province	Certified
			Gunung Kemasan	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District, Kalimantan Selatan Province	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and Kotawaringin Timur District, Kalimantan Tengah Province	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District, Kalimantan Selatan Province	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District, Kalimantan Selatan Province	Certified
			Matalok	2012		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified

17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District, , Kalimantan Selatan Province	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District, Sulawesi Tengah Province	Certified
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District, Jambi Province	Certified
			Ladang Panjang (HGU on process)	2024		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District, Sumatera Selatan Province	Certified
			Rantau Panjang (HGU on process 1843,73 Ha)	2024		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2024		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process 1398.55 Ha)	2024		-
			Sungai Jernih	2024		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and Aceh Timur District, Province Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District, Kalimantan Barat Province	Certified
			Awatan	2014		Certified
			Karya Palma (HGU on process 4760.70 Ha)	2024		-
			Pelanjau (PT BAL)	2019		Certified
			Pelanjau (HGU on process 4071.76 Ha)	2024		-
			Beturus (HGU on process 4071.76 Ha)	2024		-
	MALAYSIA					

1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified

			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kemaman, Trengganu	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas	2010	Kempas	2010	Jasin, Melaka	Certified

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

	SOU 27		Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
	P & G (New Britain Palm Oil)					
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified

			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP	2010		Certified

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

		VOP East (1,815 Smallholders)	2008	Certified
		VOP Central (1,958 Smallholders)	2008	Certified
		VOP West (1,277 Smallholders) Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008	Certified
		LSS Kapiura (847 Smallholders)	2008	Certified
		VOP Kapiura (551 Smallholders)	2008	Certified
	<p>This Time Bound Plan has been Approved by RSPO Secretariat on 13 July 2023. Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. There is change of time bound plan, with detail:</p> <ul style="list-style-type: none"> • Uncertified area in PT Sedjahtera Indo Agro: postpone become 2024 due to HGU process • Uncertified area in PT Bahari Gembira Ria: postpone become 2024 due to HGU process • Uncertified area in PT Budidaya Agro Lestari: postpone become 2024 due to HGU process • For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). https://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operation 			
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard			
	<p>The part area of associated smallholder (KKPA Sungai Cengal under PT LMI) which supplied to Rantau POM has been certified under PT LMI-Rantau POM (Certificate No. SGS-RSPO/PC22-00042 dated 8 July 2022).</p>			

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2.1	<ul style="list-style-type: none"> • Octo HPN Nainggolan (Lead Auditor Witnessing) Indonesian citizen, Bachelor of Agriculture, majoring in Agricultural Socio-Economic (Agribusiness). Seven years of experience working since 2004 in oil palm plantation companies in Indonesia and participated in several trainings, namely: Nature Conservation Training and Biological Resources in HCV support, Basic Plantation Management Program, Integrated Pest Management training, Management System Certification (ISO 9001:2008 / SNI 19011 -9001:2008), Environmental Management System (ISO 14001:2004), OHSAS based SMK3, RSPO Lead Auditor Course supported by Proforest and Wild Asia, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, supply chain certification system training and Lead training RSPO Renewable Energy Directive auditors. He currently works as an auditor at the Certification Body. During the audit he witnesses the team. • Septian Maulana (Lead Auditor Witnessed). Indonesian citizen, Bachelor of Economics, Pamulang University. Have experience as permanent staff on a coconut plantation palm. Training that has been attended includes certification of Candidates for Occupational Safety and Health Experts by the Ministry of Manpower and Indonesian Transmigration; Basic Fire Extinguishing and First Aid for Accidents (P3K); Awareness Management System Integrated (ISO 14001, and ISO 45001 in 2020); Awareness (ISO 19011, ISO 17065, and ISO 17021) in 2020; Lead ISO 9001:2015 Auditor in 2021, ISPO Lead Auditor in 2021, RSPO Lead Auditor in 2021, Social Awareness SMETA Audit in 2022 and RSPO ISH Standards Training in 2022, RSPO SCC Lead Auditor in 2023. During this audit, he verified BMP, OHS, Worker Welfare and Transparencies. • Rindu Galih Rezza Rachmansyah (Auditor). Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. In this audit he was verify SCC, Legality, TBP and Partial Certification. • I Wayan Sudi Antara (Auditor). Bachelor of Agricultural Engineering at the IPB University Bogor. Experienced in preparing Environment Impact Assessment since 1990 (has a competency certificate for Team Leader for EIA Preparation), involved as an auditor assessing the performance of Sustainable Production Forest Managers for both the Indonesian Ecolabel Institute/LEI scheme since 1997 and the Ministry of Forestry scheme since 2002 (has Auditor and LEI certificates). Previously worked at a Forestry Consultant, experienced in ISPO & RSPO assessment as an auditor (has passed ISPO & RSPO training). The training he has followed namely: Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. During this assessment, he verified the aspects of environment, Social, conservation and GHG aspect. • Muhammad Yusuf Safardan (Trainee Auditor). Indonesian citizens. Bachelor of Agriculture from Andalas University with the Agribusiness study program and Master of Defense from the Defense University of the Republic of Indonesia with the Defense Management study program. IRCA 14001 certified Lead Auditor training and Awareness of Management System Certification (ISO 9001:2015/SNI, ISO 19011-2015, ISO 17021, and ISO 45001) and ISPO Certification System. He has worked as IT and HRD staff in a retail company. In this audit he was assigned to carry out verification related to BMP and OHS aspects supervised by lead auditor. <p>Curriculum vitae (CV) of the members and assessment team is available at the office PT Mutuagung Lestari Tbk.</p>

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2.1	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for ASA-2.1 onsite audit: 6 days</p> <p>Number of working days for ASA-2.1 onsite audit: 18 Working days</p>
2.2.2	Assessment Process
ASA-2.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Langgeng Muaramakmur to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Public Stakeholder Notification was made on RSPO and MUTU Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment</p> <p>The Opening and Closing meetings were held online and attended by management representatives such as Area Controllers, Estate and Mill Managers, PSQM staff, and operational staff. At this Assessment, there is reduction scope that Lanting Estate move its supply base. At the closing meeting the conclusions of the auditor team were accepted by the auditee, but the auditee stated that they would use the Error of Fact mechanism. Based on additional facts sent from the beginning there were 1 minor NC raised to major 1 OFI</p> <p>Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel.</p> <p>Some opportunities for improvement of the results ASA-2.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-2.2)</p> <p>The assessment program please find Appendix 2.</p>
2.2.3	Locations of Assessment
ASA-2.1	<p>Number of units in this certification activity is 1 (one) Mill and 3 (three) estate. The consideration for risk assessment is geographic locations, distance of estate, complexity of labor, landscape setting, presence of HCV, number of communities/conflicts, legality etc. And also, because this assessment is for onsite audit ASA-2.1 so auditor team determine to increase the point sample in sample unit (more than 1 Division visited during the field observation). On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Bebunga Mill</p> <ul style="list-style-type: none"> • Weighbridge. Observations related to FFB acceptance procedures and employment aspects

- Security posts. Observations related to work procedures, supervision of FFB entry and exit and employment aspects
- Grading Station. Field observations related to the implementation of OHS aspects and work techniques.
- Loading Ramp Station. Field observations related to the implementation of OHS aspects.
- Sterilizer Station. Field observations related to the implementation of OHS aspects.
- Engine Room Station. Field observations related to the implementation of OHS aspects, employment and work procedures.
- Boiler Station. Field observations related to the implementation of OHS aspects, employment and work procedures.
- Press Station. Field observations related to the implementation of OHS aspects, employment and work procedures.
- Emergency Response simulation. Field observations related to the implementation of OHS aspects, simulation of activities and work procedures
- WWTP. Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- Empty Bunch Area. Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- Laboratories. Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- Housing Complex. Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- Temporary Hazardous Waste Storage (TPS LB3). Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- Workshop. Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- WTP. Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- Landfill at Block E50. Observations related to domestic waste management.

Bebunga Estate

- Harvest. Block E2/3 Observation of safe work practices and worker interviews regarding work procedures, OHS and worker welfare.
- Maintenance. Block E7/8 Observation of safe work methods and worker interviews regarding work procedures, OHS and worker welfare.
- Chemical Warehouse. Observation of storage conditions, MSDS, OHS implementation, emergency facilities, and material stock.
- Emergency Response Fire Warehouse. Observation of storage conditions, MSDS, implementation of OHS, emergency facilities, and condition of emergency response facilities and infrastructure as well as procedure simulations.
- Fuel and Oil Warehouse. Observation of storage conditions, MSDS, OHS implementation, emergency facilities, and material stock.
- B3 Waste TPS. Observation of storage conditions, MSDS, OHS implementation, emergency facilities, and material stock.
- BSS House. Observation of the condition of the washing house and equipment storage, MSDS, OHS implementation, emergency facilities, and material stock.
- HGU Stakes No. 27,28 & 29. Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.

- **Conservation Area (Cave Area) at Block B17.** Observations related to conservation area management.
- **Enclave Area at Block D24.** Observations related to HGU area that has been enclaved.

Bakau Estate

- **Area HCV (1+4) Block B41.** Field observation related pole condition and conflict potension.
- **Area HCV (1+4+6) Block A010/ C41/40.** Field observation related HCV management.
- **HGU Pole No. 01, 02 and 03.** Field observation related pole condition and conflict potension.
- **Area Enclave Block I39 Division 3.** Field observation related areal boundary and conflict potension.

Sungai Cengal Estate

- **HGU Stakes No. 01, 02 & 03.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **Conservation Area (Riparian of Bebunga River) at Block C27.** Observations related to conservation area management.
- **Conservation Area (Forestry Area) at Block C19.** Observations related to conservation area management.
- **Enclave Area at Block N04.** Observations related to HGU area that has been enclaved.
- **Manuring Activity at Block I20/21.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Spraying Activity at Block J22.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Pest (Oryctes) Control with Pesticide at Block C38.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Housing Complex.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Central Warehouse.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Pesticide Storage.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Fertilizer Warehouse.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Firefighting Storage.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Daycare.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Landfill at Block J15/16.** Observations related to domestic waste management.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	<p>Consultation of stakeholders for Bebunga POM – PT Langgeng Muara Makmur held by:</p> <ul style="list-style-type: none"> • Public announcement by Mutuagung website on 28 August 2023. • Consultation meeting and interview with Internal Stakeholder (labor union, and gender committee) on 12 September 2023. • Public consultation meeting with government institution of Kotabaru District (Department of Manpower, Department Environment and Land office) on 12 September 2023 • Public consultation meeting with communities (Lintang Jaya Village and Sekodayan Village) on 12 September 2023

	<ul style="list-style-type: none"> Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch on 06 September 2023 <p>Numbers of input from stakeholders were clarified by Bebunga POM – PT Langgeng Muara Makmur</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit ASA-2.2 will be conducted 8 to 12 months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Bebunga POM – PT Langgeng Muaramakmur Subsidiary of Sime Darby Plantation Berhad operation consisting of one (1) mill and 3 (three) oil palm estates.

During the assessment, there were one (1) Nonconformity were assigned against Major Compliance Indicators; No Nonconformity were assigned against Minor Compliance Indicators and one (1) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidence.

MUTUAGUNG LESTARI found that Bebunga POM – PT Langgeng Muaramakmur complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO compliance certification 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>The certification unit has a list of information/documents that can be accessed and/or shared with stakeholders such as government agencies and NGOs which is presented in document Answering Information procedure number 015/Admin-PIF/15 dated December 6, 2021. In the document There are 17 types of documents that can be accessed by stakeholders according to the authority of the company, including the following:</p> <ol style="list-style-type: none"> 1. Certificate of land rights/use rights 2. Occupational Health and Safety Plan (OHS) 3. Plans and assessments related to environmental and social impacts 4. High Conservation Value (HCV) Documentation 5. Pollution prevention and reduction plan 6. Detailed information regarding complaints and grievances 7. Company operational procedures 8. Continuous improvement plan 9. Public summary of the certification assessment report 10. Human Rights Policy 11. List of employees 13. Firefighter inventory list 14. Reports related to OHS management in the company 	

16. Negotiation procedures

17. Social Policy

Based on interview with stakeholders (Village representative, contractor, institution and workers), information obtained that stakeholder has knowledge related company documents that can be accessed by the public and how to access the information.

1.1.2

The company shows a document reporting the implementation of fire prevention and control per year to the Kotabaru Regency Environmental Service, which is listed in the 2022 KSP Minamas Plantation Region Fire Report document, document handover date 21 January 2023 with number 01/KSP-LPKB/II/2023. In summary, the points listed in the report include whether or not there was a fire incident, prevention activities and so on.

The company has reported the implementation of OHS to the Manpower Department every 3 months, which was last reported on July 10 2023 for the second quarter of 2023. This includes several points such as *P2K3* reports, *P2K3* organizational structure, recapitulation of work accident reports, equipment inspection reports. safety equipment, and *P2K3* meeting minutes. This report has been received by the Labor Inspectorate of the Manpower and Transmigration Service of the South Kalimantan Provincial Government.

Environment report

1. RKL-RPL Reporting for Semester-1 of 2023 in the form of an Electronic Receipt of the Environmental Electronic Reporting Information System Ministry of Environment and Forestry ID: 1690809744-1177 Period: 01-01-2023 to 06-30-2023.
2. Air Pollution Control Reporting Semester-1 of 2023 in the form of an Electronic Receipt of the Environmental Electronic Reporting Information System Ministry of Environment and Forestry ID: 1690809876-1177 Period: 01-01-2023 to 30- 06-2023.
3. Water Pollution Control Reporting Semester-1 2023 in the form of an Electronic Receipt of the Environmental Electronic Reporting Information System Ministry of Environment and Forestry ID: 1690809826-1177 Period: 01-01-2023 to 30- 06-2023.
4. Hazardous Waste Control Reporting Semester-1 2023 in the form of an Electronic Receipt of the Environmental Electronic Reporting Information System Ministry of Environment and Forestry ID: 1690809922-1177 Period: 01-01-2023 to 06-30-2023.

Legal Aspect:

1. HGU Utilization Report of PT Langgeng Muaramakmur period of 2022 reported to National Land Agency of Kotabaru Regency in 17 February 2023.
2. Investment Progress Report of PT Langgeng Muaramakmur (Plantation) period of 1st Quarter 2023 reported online to Investment Minister in 10 April 2023.
3. Investment Progress Report of PT Langgeng Muaramakmur (Palm Oil Mill) period of 1st Quarter 2023 reported online to Investment Minister in 10 April 2023.

Worker welfare Aspects

- Report on the use of PT Langgeng Muara Makmur's *PKWT* (temporary workers) to the Manpower and Transmigration Service of Kotabaru Regency on July 14 2023, a number of 3 workers.
- The report on the use of *PKWT* (temporary workers) Bebunga Estate workers to the Manpower and Transmigration Service in Kotabaru Regency on January 5 2023 was 1 worker.
- Mandatory Employment Reporting at Company number: 72169.20230905.0001 dated 5 September 2023 with an obligation to report back on 5 September 2024.

1.1.3

The certification unit can show has a procedure for communication and consultation to stakeholders in document No. 016/Admin-RSPO/21 dated July 1, 2021. The document describes the mechanism regarding requests for information and responses provided

by the company to all stakeholders.

The company shows the Information Request and Response Logbook, it is known that there were no requests for information from stakeholders addressed to the company for 2023.

1.1.4

The certification unit has a SOP for Communication and Consultation to Stakeholders in document No. 016/Admin-RSPO/21 dated July 1, 2021. Information requests will be selected and classified by the Unit Head. The time for submitting information from the Unit Head to each department is less than 2 week and must be responded to immediately or less than 2 weeks from the date of receipt. Monitoring requests for information, responses, and document preparation are carried out by a social official appointed in Mill and Estate.

The procedure was socialized on June 21, 2022. The procedure has also been socialized to stakeholders on July 27, 2022 which was attended by 5 contractor workers in the Bakau Estate.

- On February 09, 2023, the company has socialized sustainable palm oil standards to FFB Suppliers by Palm Oil Mills, the material presented includes identifying, mapping the location of smallholder plantations that sell FFB to collectors and encouraging oil palm plantations to have legality.

1.1.5

The certification unit has an updated list of stakeholders for PT Langgeng Muara Makmur (Estates and Mill unit) consisting of legal entities, indigenous peoples, local communities, workers' organizations, smallholders, FFB suppliers, and independent services, and NGOs. The document contains a list of names, types of relevant stakeholders, and stakeholder contacts.

Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example, interviews with the Labor Agency of Kotabaru Regency. The results of the interview can be seen in section 3.5 Summary of Arising Issues from Public and Auditor Verification.

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 the ethical codes in all operational activities and transactions. This policy is stated in the Sime Darby Plantation Group Code of Conduct updated in December 2021. This policy generally explained that their ethical code is here as follows:

- Collaborating, respecting each other's, equal opportunity, non-discrimination, and protecting human rights.
- Avoid conflicts of interest.
- Avoid bribery and corruption.
- Ensuring the confidentiality of the information and preventing the abuse of obtained information through the company's operational activities.

Furthermore, it's specifically stated in article number 7 that the group prohibits their workers from any bribery, illegal, and unethical business practice. Code of ethics policy has been implemented by the company in all business operations and transactions including recruitment and employment contracts.

1.2.2

As one of the mechanisms for monitoring code of ethics compliance to contractor, the company also conducts performance evaluations on parties that work with the company (Contractors and Suppliers) on a regular basis.

The unit of certification also has a mechanism to monitor compliance and the implementation of ethical business policies and practices through compliance checks and evaluations. Such as, the certification unit conducts periodic internal audits to ensure operational units comply with policies and SOPs. The scope of the internal audit is the compliance of each unit in the plantation and mill to all aspects contained in the RSPO P&C such as aspects of employment, environment, BMP and other aspects. Last monitoring has done by the company at 15 – 20 August 2023 and there is no non compliance related ethical business practice policy.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The company has list of regulations of 2023 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

BMP and OHS

- The company adheres to regulations regarding the suitability of land suitable for oil palm plantations, this is in accordance with Minister of Forestry and Forestry No. 376 of 1998
- Competency standards and certification for those responsible for wastewater treatment operations and those responsible for controlling water pollution in accordance with Minister of Environment and Forestry Regulation No. 5 of 2018
- Safety and Health of Lifting and Transporting Aircraft in accordance with Government Regulation No. 22 of 2021.
- Concerning Storage of Hazardous and Toxic Waste in accordance with Minister of Environment and Forestry Regulation No P.12/MENLHK/SETJEN/PLB.3/5/2020

Environment Aspect

- Letter from Head of Planning Bureau, Secretary of Central Commission, Department of Agriculture No. 008/ANDAL/BA/II/1995, dated 27 February 1995. Regarding the ratification of the Environmental Impact Analysis (AMDAL) document for Palm Oil Plantations and Factories covering 4 companies in the name of PT. Laguna Mandiri, PT. Langgeng Muaramakmur, PT. Paripurna Swakarsa and PT. Swadaya Andika with a total gross area of 77,290 Ha and factories with a capacity of 60 tons of FFB/hour each. The AMDAL document explains the scope of the study for PT. Langgeng Muaramakmur covers an area of 21,840 Ha with a Mill capacity of 60 tons of FFB/hour.
- Letter from the Head of the District Environmental Agency. Paser, East Kalimantan Province No. 660.1/210/DPLH/BLH/2011, dated 24 May 2011. Regarding ratification of Environmental Management Documents (DPLH) for an oil palm plantation area of 1,213 ha.
- Letter from the Head of the District Environmental Agency. Kotabaru South Kalimantan Province No. 660/23/tatling-AMDAL/BLHD/2013, dated 5 June 2013 concerning ratification of the UKL-UPL Document for the Construction and Operation of Special Terminals and Supporting Facilities (CPO Pier 10.11 meters long and Kernel Pier 16.44 meters long).
- Decree of the Head of the Kotabaru Regency Environmental Service No. 660/59/Tatling-DLH/2023, dated 12 January 2023 Concerning Environmental Feasibility of Addendum to ANDAL and RKL-RPL Type C Palm Oil Plantation and Processing Activities with Bebunga Factory Capacity of 60 FFB/Hour and other supporting facilities with a land area of ±10,812 .29 Ha located in Bakau Village, Betung Village, Pamukan Indah Village, Balamea Village, Mulyo Harjo Village, Kalian Village, Tamiang Village, Harapan Baru Village, Lintang Jaya Village, Binturung Village and Manunggal Lama Village, Kec. Pamukan Utara and Kec. Durian River District. Kotabaru Prov. South Kalimantan By PT. Lasting Muara Makmur.
- Operational Feasibility Letter for Utilizing Liquid Waste for PT Langgeng Muaramakmur Land Application No. 660.3.4/1081/DLH-PPKL/XI/2022 Date 28 November 2022 from the Kotabaru Regency Environmental Service

- Decree of the Head of DPMPTSP Kotabaru Regency No. 503/0272/PSLB3-P-DPMPTSP/2021 dated 12 April 2021 concerning Temporary Storage Permit for Hazardous and Toxic Waste for PT Langgeng Muaramakmur.

Legal Aspect

The company already has a HGU with an area of 16,990.75 Ha with the following details:

- Land title certificate No. 12 the year of 1997 covering 15,533 Ha
- Land title certificate No. 04 the year of 1998 covering 828.774 Ha.
- Land title certificate No. 0096 the year of 2019 covering 628.98 Ha

Of the entire area there is an area of 3,244.65 Ha which is not included in the scope of this certification (Lanting Estate) which is the supply base of Rantau POM. Thus, the scope of the certification this time is 13,746.10 Ha.

Other than HGU, the company also has an *IUP* in accordance with

- Plantation Business Registration Letter No. 461 / Menhutbun-VII / 2000 for plantations covering an area of 15,533 ha and a Bebunga mill with a capacity of 60 tons of FFB / hour.
- Approval of Re-registration of Plantation Business Permits in accordance with SK 188.45 / 386 / KUM / 2009 for plantations covering an area of 15,533 ha and processing factories with a capacity of 60 tons / hour.
- Plantation Business Registration Letter No. HK.350 / 795 / Dj.Bun.5 / XI / 2001 for Estates covering an area of 828.77 ha in Paser District, East Kalimantan (Bebunga Estate).

Regarding the *IUP* whose validity period has expired in 2019, the company has the opportunity to ensure the timeline for the process of extending the Term of Approval for Re-registration of Plantation Business Permits that have been submitted since October 4, 2019. It became OFI. Based on the results of interviews with the Plantation Agency of Kotabaru Regency, it is known that the regulations related to the timeline for extending the Re-Registration of Plantation Business Permit (*IUP*) are no longer valid because these regulations have not been in effect since 2021. Based on this, OFI is in the assessment Previously it was no longer valid and PT Langgeng Muaramakmur's Plantation Business Permit (*IUP*) is still valid today.

Worker Welfare

- The company has implemented regulations regarding wages such as minimum wages, overtime and rest rights.
- Submit periodic employment reports to the relevant agencies.
- Facilitating workers with Health and Employment BPJS.

2.1.2

The certificate holder has a documented system to ensure legal compliance listed in the Legal Requirements Procedure, dated on May 1, 2017. The procedures include explaining that regulations can be obtained and updated by contacting government and non-government agencies to ensure that the latest regulations apply, including international, national and local and actively visit related websites, the latest monitoring of compliance and updating regulations are held on Januari 2023. Evaluation for third parties has been mentioned on indicator 2.2.2

2.1.3

The company has had SOP of HGU Stakes Installation and Maintenance (No. LGL ratified on 12 May 2011), set that the poles maintenance will be conducted twice a year. The company has shown the latest documentation of semesterly HGU monitoring, described that all HGU are well maintained.

The company shows the document for monitoring the HGU stake which is carried out twice a year. The last HGU stake monitoring was carried out in June 2023 for first semester in 2023. The report on the inspection and maintenance of the boundary markers has provided complete information regarding the number of stakes, condition of stakes, location of stakes, coordinates of stakes and

corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Field observations to several HGU boundary markers in Bebunga, Bakau & Sungai Cengal Estate, show that the poles sampled during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

	Status: Comply	
--	-----------------------	--

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

2.2.1

Companies can show a list of partners (contractors and suppliers) included in the company's stakeholder list as of January 15 2023. Some of them are as follows:

- Toko Mitra Kita (Procurement of safety equipment)
- CV Bintang Timur (CPO transport contractor)
- CV Putra Fajar Binturung (Kernel transport contractor)
- PT BES (Hazardous waste transporter)
- DII

2.2.2; 2.2.3

The company indicates that all cooperation contacts contain clauses regarding the fulfillment of relevant legal obligations, including the non-use of underage workers. For example, in the Employment Agreement Letter between PT Langgeng Muaramakmur and CV Gio Usaha Mandiri Number 025/BBE/SPK-LKL/I/2023-Ecer+Pupuk Hole Planting dated January 14 2023, it briefly explains:

- Contractor workers are required to comply with OHS standards
- Must follow labor laws
- Comply with and comply with all legal requirements, including the provisions of local governments and authorized public officials.
- Restrictions on employing underage workers and/or illegal workers and human rights

Then, the company can also show proof of compliance with regulations carried out by contractors, for example for the Heavy Equipment Rental Contractor PT Jaya Mulia Bintang Borneo including: list of workers, wages paid, *BPJS* membership and operator license.

Based on interview with contractor for example CV Mutiara Senja, it conveyed that contractor has provide *BPJS* to workers.

	Status: Comply	
--	-----------------------	--

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

2.3.1 & 2.3.2

Based on the results of field observations and document review, it is known that currently all FFB received the Bebunga Factory comes from the for Main Estate (Bebunga, Bakau, & Sungai Cengal Estate), one scheme smallholder (RSPO Certified from PT Laguna Mandiri – Betung Factory) and does not accept FFB originating from the Supplier (Direct or Indirect). All FFB originating from Main Estate is RSPO certified & one scheme smallholder that has been RSPO Certified.

	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 contained in the LMR 2023 Business plan document approved by the Head of SQM contains plantation business information including production projections, plantation and factory operational plans, FFB source plans, cost projections and others, for example:

Description	UNIT	Year				
		2023	2024	2025	2026	2027
FFB Production Kebun Inti	Ton	138,912	154,739	182,952	214,632	248,532
CPO Production	Ton	26,649	28,767	32,973	38,593	45,400
OER	%	21.31	21.50	21.60	21.90	22.00
PK Production	Ton	5,315	5,486	6,259	7,313	8,667
KER	%	4.25	4.10	4.10	4.15	4.20
Replanting	Ha	1,303	1,022	781	58	-

3.1.2
 The company has carried out an evaluation of the replating program in the previous period, for example as stated in the PMU Report Assessment document Bebunga Estate PT Langgeng Muara Makmur replating from November 2022 to May 2023. It was stated that the progress of the replating program had reached 81.67% and based on interviews with management, in the review Company management is considering making the latest replating targets for the coming period.

There is an annual replating/replanting program that is projected for at least the next five years, some of which are listed in the Long-Range Replanting Program – KSP Region for the period 2022 – 2026, including the following:

- Period 2023 area of 1.941,25 Ha
- Period 2025 area of 1.578,64 Ha
- Period 2026 area of 325,30 Ha
- Period 2027 there is no replating
- Period 2028 there is no replating

The company shows the BAPP Replanting Process Document Checklist document with number 027/MMTC-AWD/XII/2022/Plant for replating in 2023 which consists of Checklist Form, Approval Memorandum, Invoice, Receipt, and Work Recapitulation along with attachments therein signed by the Estate Manager, Area Controller, and Region Controller.

3.1.3
 Structured Crop Recovery Assessment (SCRA) is a company program to check the quality of crushed fruit and the quality of fruit sent to the factory by ensuring that there are no losses that cause losses to the company. This check is carried out 4 times a year. Based on SCRA management reviews and provides recommendations to overcome the issues found in the assessment. Monitoring of the issues was held by SQM team with Estate Assistant and Supervisor.

Status: Comply

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

3.2.1

The company showed the Minamas Agriculture Reference Manual document which came into effect on September 1 2013. In sections 3 and 4 regarding the 3rd version of the replanting and land preparation policy. In summary, the document explains the following matters:

- Replanting policy
- Land Suitability Study
- Soil conservation by building terraces
- Road construction
- Making ditches for water conservation by making drainage channels

Based on document studies and field observations, the company implements soil and water conservation by constructing terraces, central ditches, Field Drains and Silt Pits. Apart from that, in accordance with the no-burn land management policy which was established on July 1 2022, signed by the Area Controller, it also explained that land clearing activities were carried out mechanically, replanting activities were carried out mechanically, and provision of water reservoirs at the location.

The company shows the policy regarding pesticide mitigation contained in the Memorandum dated 20 December 2022 regarding the policy of reducing the use of class 1A and 1B pesticides which was signed by the Area Controller explaining that all business units at PT LMR are required to always evaluate and control the use of class 1A and 1B pesticides. seriously and sustainably, so that the LMR area can have zero use of class 1A and 1B pesticides.

The company also carries out ISPO RSPO internal audits to monitor operational performance. The company showed the 2023 ISPO RSPO LMR Internal Audit Report document which was carried out on 15-20 August 2023. In the 2023 internal audit, 9 ISPO non-conformities and 13 RSPO non-conformities were found, all of which had closed status on 31 August 2023

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	: Sime Darby Plantation Berhad
RSPO Membership Number	: 1-0008-04-000-00
Name of Certified Unit	: PT Langgeng Muaramakmur – Bebunga POM
Name of Certification Body	: PT Mutuagung Lestari
RSPO PalmTrace ID Number	: RSPO_PO1000001380
Number of Mills	: 1
Number of Estates	: 3
Production Area (ha) - Estate	: 7,439
Certified Area (ha) - Estate	: 13,746

Status: Comply	
-----------------------	--

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company shows the procedures related to plant maintenance as contained in the Agronomy Reference Manual No. 110/EST-ARM/13 dated September 1, 2013 which was approved by the Head Plantation Upstream Indonesia. The document is divided into 18 sections, namely:

1. Plant material
2. Breeding technique
3. Replanting
4. Land preparation

5. Plant density
6. Age of harvesting
7. Field maintenance
8. Fertilization
9. Canopy management
10. Water management in coastal areas and peatlands
11. Ablation
12. Maturity standard
13. Spinning harvest
14. Loose fruit
15. Plant protection
16. Weed control
17. Manufacture of legume cover crops
18. Rainfall recording

The company shows the SOP for the processing process as well as the process of monitoring and measuring the quality of Crude Palm Oil (CPO), which are listed in the Palm Oil Processing System Document No. 110/POD-FAC/07 which includes, among others:

1. Chapter I on Fundamentals of Palm Oil Processing
2. Chapter II on Stockpiling of Oil and Palm Kernel
3. Chapter III on Factory Wastewater Control
4. Chapter IV on Water Treatment
5. Chapter V on Laboratory Analysis

Based on the document, the company already has an SOP that covers all activities from estate and mill and always conveyed to workers regularly before starting work and can be accessed by workers.

3.3.2

The company has a system that aims to monitor the implementation of SOPs so that operational activities can run well, such as conducting internal audits of Plantation and Factory operations, ISPO and RSPO Internal Audits, financial audits carried out by external parties, structured crop recovery assessments to monitor the quality of defects in the field. and daily internal supervision carried out by supervisory levels from Foreman to Manager.

The last operational ISPO and RSPO internal audit, for example, was carried out at PT Langgeng Muaramakmur on 15-20 August 2023 with the finding of 9 nonconformities for ISPO and 13 nonconformities for RSPO. The discrepancies have also been corrected on June 30, 2022. All discrepancies have been corrected and have the status is close.

3.3.3

The last operational ISPO and RSPO internal audit, for example, was carried out at PT Langgeng Muaramakmur on 15-20 August 2023 with the finding of 9 nonconformities for ISPO and 13 nonconformities for RSPO. The discrepancies have also been corrected on June 30, 2022. All discrepancies have been corrected and have the status is close.

The company also records monitoring results and follow-up actions. Based on a review of documents such as the monthly estate performance document, the company records the progress of implementing operational activities such as production records, fertilization, grading, replanting progress and road maintenance. Apart from that, the PMU Report Document for the Bebunga Estate Assessment of PT Langgeng Muara Makmur which includes monitoring such as area coverage, seeding, replanting, fertilization, thorough maintenance and verification action plans.

Status: Comply	
-----------------------	--

3.4

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

3.4.1

Environmental Impact Assessment (EIA)

- Environmental Impact Analysis Document (AMDAL, 1995) Palm Oil Plantation and Factory includes 4 companies in the name of PT. Laguna Mandiri, PT. Langgeng Muaramakmur, PT. Paripurna Swakarsa and PT. Swadaya Andika with a total gross area of 77,290 Ha and factories with a capacity of 60 tons of FFB/hour each. The AMDAL document explains the scope of the study for PT. Langgeng Muaramakmur covers an area of 21,840 Ha with a Mill capacity of 60 tons of FFB/hour. Validation documents are available based on the Letter of the Head of the Planning Bureau, Secretary of the Central Commission, Department of Agriculture No. 008/ANDAL/BA/II/1995, dated 27 February 1995.
- Environmental Management Document (DPLH, 2011) for oil palm plantation activities covering an area of 1,213 ha. For PT. Lasting Muaramakmur in the East Kalimantan Province region. Validation documents are available based on the Letter of the Head of the District Environmental Agency. Paser, East Kalimantan Province No. 660.1/210/DPLH/BLH/2011, dated 24 May 2011
- UKL-UPL Document (2013) activities for the Development and Operation of Special Terminals and Supporting Facilities (CPO Pier 10.11 meters long and Kernel Pier 16.44 meters long). For PT. Langgeng Muaramakmur in the South Kalimantan Province region. Validation documents are available based on the Letter of the Head of the District Environmental Agency. Kotabaru Prov. Kalimantan Selatan No. 660/23/tatling-AMDAL/BLHD/2013, dated 5 June 2013

Year 2023

- Addendum Documents for ANDAL and RKL-RPL Type C (2023) Palm Oil Plantation and Processing Activities With a Bebunga Factory Capacity of 60 FFB/Hour and other supporting facilities with a land area of ±10,812.29 Ha located in Bakau Village, Betung Village, Desa Pamukan Indah, Balamea Village, Mulyo Harjo Village, Kalian Village, Tamiang Village, Harapan Baru Village, Lintang Jaya Village, Binturung Village and Manunggal Lama Village, Kec. Pamukan Utara and Kec. Durian River District. Kotabaru Prov. South Kalimantan By PT. Langgeng Muara Makmur. Environmental Feasibility Decree (SKKL) is available based on the Decree of the Head of the Kotabaru Regency Environmental Service No. 660/59/Tatling-DLH/2023, dated 12 January 2023
- The company shows a letter from the Head of the District Environmental Service. Kotabaru No. 660/1019/Tatling-DLH/2023 dated 23 August 2023 Regarding Document Revision Process. Contains improvements to the AMDAL Addendum document which does not yet cover plantation afdeling.
- The company shows a letter from the Head of the District Environmental Agency. Kotabaru No. 660/226/DPLH/2023 dated 25 August 2023 Regarding the Document Revision Process. Load the DPLH Addendum request.

OFI:

Companies must continue to improve environmental documents in accordance with the scope of operational areas and the scope of all operational activities

Social Impact Assessment (SIA)

PT. Palm Oil Plantation and Mill (SIA) Social Impact Identification Study Document. LMR 2010 by YASBI involving affected parties. The assessment method is carried out using a questionnaire list that has been prepared through an interview and data measurement system. There is a recording of the Social Impact Assessment (SIA) socialization/public consultation meeting on December 6 2009 with 50 participants, including representatives from surrounding villages, community leaders and representatives from PT. LMR. Evidence of community involvement in the form of attendance lists, photos of implementation and examples of

questionnaire attachments in the SIA document for Binturung Village, Sesulung Village, Selabak Village, Tanjung Sari Village, Bakau Village, Tamiang Village, Mulya Jati Village, Lintang Jaya Village, Sekayu Village and Harapan Village.

The results of the SIA Study explain the impacts arising from plantation activities, including population, education, livelihoods, income, health, facilities and infrastructure, customs and culture of the communities in the villages around the company, efforts to manage the social, economic and cultural environment by PT . LMR and public perception about the existence and benefits of PT. LMR

Social impact assessments (SIA) are included as part of the complement of all environmental impact assessments. The assessment involved all affected parties, both internal and external stakeholders, including employees, trade unions, village heads around the plantation, local NGOs and plasma farmers with a total of 50 representatives of relevant stakeholders.

Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. Apart from that, the SIA study has also been socialized to village residents and stakeholders in the affected areas with evidence of an invitation for socialization carried out on January 13 2010. In the report there is also a Social Management Plan and Social Monitoring Plan matrix which contains recommendations for social impact management. identified.

High Conservation Value Assessment (HCVA)

Identification and Analysis Report on the Existence of High Conservation Value (HCV) in the PT Permit Area. Langgeng Muaramakmur, Kotabaru Regency, South Kalimantan Province in collaboration with YASBI in 2009. In the document there is a map of PT High Conservation Value Areas. Lasting Muaramakmur with a scale of 1:110,000. This activity was carried out within the scope of PT LMR where there are 4 estates, namely Bebunga Estate, Bakau Estate, Sungai Cengal Estate and Lanting Estate.

Study of the scope of the PT LMR permit area covering an area of 16,361.77 ha, identified 6 (six) HCV classes covering an area of 1,382.82 Ha in the form of river borders, spring areas, cave areas, endangered species, and swamps. In the report there is a High Conservation Value Area Management and Monitoring Plan matrix and management recommendations for all identified HCV areas.

3.4.2

The Environmental Management Plan Matrix and Environmental Monitoring Plan available are as follows:

1. Changes in Air Quality and Noise Levels
2. Forest and land fires
3. Airport/Airstrip
4. Changes in water quality
5. Changes in the quality of roads and bridges
6. Potential for inundation and flooding
7. Pest and disease attacks
8. Job and business opportunities
9. Change in income
10. Social conflict
11. Disease patterns (Public health)
12. LB3
13. Clean Water

Social Impact Assessment (SIA)

The results of the SIA (2009) assessment include negative and positive impacts, livelihoods and changes in livelihoods due to the establishment of companies, aspects of cultural and religious values, population growth, changes in access, public health and

infrastructure.

Social impact management & monitoring program 2023

1. Health services
2. Education
3. Community assistance: basic necessities, sacrificial cows, traditional ceremonies
4. Community empowerment: employment and business opportunities for local contractors
5. Assistance for village infrastructure
6. Plasma management
7. Community FFB Acceptance
8. Social effects of Replanting
9. Improvement of employee housing facilities

Results of the PT socio-economic questionnaire. LMR which was carried out on 28 July - 2 August 2023 on 36 respondents from Ds. Kukung, Ds. Pangguren, Ds. Balimea, Ds. Lintang Jaya, Ds. Binturung, Ds. Mulyoharjo, Ds. Sigendang, Ds. Tamiang, Ds. Sakadayan, as well as 13 respondents from SP representatives and the PT Gender Committee. LMR-BKE and 13 respondents from Contractors and Contractors PT. LMR-BKE. It can be concluded that the existence of PT. LMR has a positive effect on the social economy of society

Results of the PT replanting questionnaire. LMR was carried out on 28 July - 2 August 2023 on 30 respondents from Bebunga Estate, Sungai Cengal Estate, and Bakau Estate. It can be concluded that the existence of PT. LMR has a positive effect on the social economy of society.

Based on the results of field observations and interviews with external stakeholders regarding social impact management carried out by the company for the 2023 period, it can also be concluded that there are no issues related to social impacts that have not been identified by the company and all potential social impacts have been managed.

3.4.3

The company has an Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) Implementation Report for Period I 2023 (January - June 2023) containing management

Plants Produce

1. Air Quality and Noise
2. Decreased soil fertility and erosion
3. Flood
4. Water Quality
5. Waste
6. Potential for fire
7. Disruption of Flora and Fauna
8. Impact of Social Problems
9. Public and employee health
10. Aquatic Biota
11. Transportation
12. Labor
13. Community income

Replanting Activities

1. Increased erosion and surface runoff

2. Influence on aspects of biodiversity
3. Influence on social aspects

Establishment of Plasma Plantations

1. Soil Fertility Management and Erosion Monitoring
2. Flora and Fauna Management
3. Social Impact Management

Social impact management & monitoring program 2023

1. Health services
2. Education
3. Community assistance: basic necessities, sacrificial cows, traditional ceremonies
4. Community empowerment: employment and business opportunities for local contractors
5. Assistance for village infrastructure
6. Plasma management
7. Community FFB Acceptance
8. Social effects of Replanting
9. Improvement of employee housing facilities

Results of the PT LMR socio-economic questionnaire which was carried out on 28 July - 2 August 2023 on 36 respondents from Ds. Kukung, Ds. Pangguren, Ds. Balimea, Ds. Lintang Jaya, Ds. Binturung, Ds. Mulyoharjo, Ds. Sigendang, Ds. Tamiang, Ds. Sakadayan, as well as 13 respondents from SP representatives and the PT Gender Committee. LMR-BKE and 13 respondents from Contractors and Contractors PT. LMR-BKE. It can be concluded that the existence of PT. LMR has a positive effect on the social economy of society

Results of the PT LMR replanting questionnaire was carried out on 28 July - 2 August 2023 on 30 respondents from Bebunga Estate, Sungai Cengal Estate, and Bakau Estate. It can be concluded that the existence of PT. LMR has a positive effect on the social economy of society.

Based on the results of field observations and interviews with external stakeholders regarding social impact management carried out by the company for the 2023 period, it can also be concluded that there are no issues related to social impacts that have not been identified by the company and all potential social impacts have been managed.

	Status: Comply	
--	-----------------------	--

3.5

A system for managing human resources is in place.

3.5.1; 3.5.2

Companies can indicate applicable employment procedures, including:

- SOP for Employee Recruitment, Evaluation, Promotion, Retirement and Layoffs number 02/KSP-KRY/II/2021 dated January 1 2021
- Procedure for Recruitment of *PKWT* (temporary worker) and *PKWTT* (Permanent Workers) in Business Unit number P/HRM-RTK-1.0/2023 in April 2023

The procedure briefly explains the following:

- Recruitment of workers is carried out by business units or by agents

- There are no recruitment fees
- No retention of personal documents
- Minimum age 18 years
- Promotion evaluation can be carried out every year
- Retirement and layoffs are carried out in accordance with applicable government regulations

Companies can demonstrate their implementation, for example as follows:

- Job applications for workers with the initials MES along with other complete documents until the signing of the PKWT (temporary worker) work agreement number 08/03/PKWT-BBF/03/2023 dated March 1 2023.
- Record of performance evaluation and promotion of 8 top class workers (laboratory foreman, process foreman, head of electrical mechanic, head of security, grading foreman and clerk) in 2022
- Calculation results and proof of payment of pension rights for workers with the initials S at BKE on November 23 2022

Status: Comply

3.6

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

3.6.1 & 3.6.2

All operating activities have been assessed for risk to identify OHS issues, which are listed in:

- HIRAC Estate Region KSP document in 2022, which explains risk identification according to work, hazard, effect, risk control and residual risk for work, including nursery, security, observation of HGU stakes, HCV observations, plant pests census, pest spray fogging/fullpogs, trunk injection & npv virus application, rat poison application, mess employees, harvesting & loading, shoots, manuring & jik application, spraying, workshop, water treatment installation, outpatient care, emplacement care, box owl brawn, warehouse, large office & division employees, heavy equipment operators and others.
- HIRAC Mill Region KSP document in 2022, which explains risk identification according to work, hazard, effect, risk control, residual risk and PIC for work, including Loading Ramp Stations, Boiling Stations, Press Stations, Clarification Stations, Kernel Stations, Oil & Kernel Dispatch Stations, Boiler Stations, Water Treatment Stations, Engine Room Stations, Empty Strand Stations, Waste Application Stations, Laboratory Stations, Warehouse Stations, Workshop Stations and others.

The company shows evidence that all workers receive adequate OHS training, which is shown in the realization documents and OHS training documentation, for example for the following training program:

- First aid training will be held on January 23 2023.
- Emergency Response coaching and training on 02 February 2023.
- Socialization of the use of PPE and Critical Control Points on July 1 2023.
- Socialization and training on forest and land fires management with Manggala Agni 10 August 2023

Based on field visits and interviews in the field, for example at Bebunga Estate, the maintenance foreman with the initials S knows and says that internal outreach has been carried out regarding actions when work accidents occur and how to deal with work accidents.

The company has a health examination plan for all employees and a special periodic examination schedule which can be seen from the MCU schedule timeline document for the training area which is signed by the company doctor and the types of examination include checking body weight, blood pressure and cholesterol levels. Meanwhile, special examinations include spirometry, cholinesterase, audiometry and physical examination for occupational diseases. For the 2023 MCU, the company shows the results of the MCU examination carried out at the Simpang clinic on August 4 2023 which was signed by the Simpang clinic doctor. The following participant data was obtained:

- BBF: 45 people
- BBE: 82 people

- SCE: 84 people
- BKE: 82 people

Based on interviews with employees, MCU has been implemented periodically and routinely. From the report, there were 134 MCU Bakau Estate participants in January 2023. Sungai Cengal Estate February 2023 as many as 263 people. Bebunga Estate, Bebunga Factory and Bulking January 2023 as many as 353 people, which were attended by 750 people.

The company has determined resources for handling emergencies, natural disasters and accidents whose conditions are regularly monitored, for example listed in:

- Document Title: Fire Prevention and Control Facility and Infrastructure Inspection List
- Date: June 2023
- The number of firefighter boots is 61 units, firesuits are 63 units, and 11 units are overnight tents

The company also shows a list of workers who have a license for each job, for example:

UNIT	EMPLOYEE NAME	TRAINING	LICENSE NUMBER	VALIDITY PERIOD
BKE	Miswoyo	Generator (Class-1 Diesel Motor)	P.13.370/PM/PTP/X/2018	26/10/2023
	Safiudin	Generator (Class-1 Diesel Motor)	P.13.333/PM/PTP/X/2018	26/10/2023
	Ahmad Didik Purwanto	Transport Lift Aircraft	0124020822/A-OABT/63/VIII/2022	02/08/27
	M Hasan	Transport Lift Aircraft	140608-OPK3-LT/PAA/IV/2019	04/08/2024
BBE	Wisma Cahyadi	Welder	S.1535/JL/BINWASK3-PNK3/II/2019	24/02/24
	Ricky Andrianto	Welder	S.1528/JL/BINWASK3-PNK3/II/2019	24/02/24
	Sunyoto	Welder	S.1534/JL/BINWASK3-PNK3/II/2019	24/02/24
	Prayitno	Transport Lift Aircraft	0185260922/A-OABT/63/IX/2022	26/09/27
SCE	Pujianto	Generator (Class-1 Diesel Motor)	P.13.359/PM/PTP/II/2019	08/04/24
	Putut Sujiono	Transport Lift Aircraft	140620-OPK3-LT/PAA/IV/2019	08/04/24
	Abdul Ibrahim	Transport Lift Aircraft	140621-OPK3-LT/PAA/IV/2019	08/04/24
BBF	Riyanto	Class II Steam Aircraft (Stew)	404/OPK3/B.II/VI/2019	13/06/2024
	Riyadi Agus Wibowo	Class II Steam Aircraft (Stew)	405/OPK3/B.II/VI/2019	13/06/2024
	Ahmad Ulispiadi	Class II Steam Aircraft (Stew)	418/OPK3/B.II/VI/2019	13/06/2024
	Jamaludin	Class II Steam Aircraft (Stew)	411/OPK3/B.II/VI/2019	13/06/2024

Status: Comply
3.7
All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.
3.7.1; 3.7.2

Companies can show training programs created based on the results of identifying training needs for all workers, both internal and contractors, for example for 2023 including: including Harvesting, Maintenance, Fertilizing, Spraying, FFB Sorting, Fire Fighting, Pollution Prevention, General OHS, Chemical OHS, First Aid, Electrical OHS and OHS Management, etc.

Companies can show training records, for example:

- Work accident risk control training on May 10 2023 for employees at BBF was attended by 34 participants
- Contractor training on March 11 2023 at BBF
- Refresh training thinning out on 31 August 2023 at BKE which was attended by 27 participants.

Based on the results of interviews with workers at both the Mill and Estate (Harvesters and Processing Workers at the Mill), information was obtained that the workers understood the technical work in their work area.

3.7.3

Company provided an understanding of SCCS to weighbridge operators, sorting, sustainability, security, and laboratory on 28 January 2023. The materials discussed included the definition of RSPO SCCS, new standards for RSPO SCCS, principles for compliance with RSPO SCCS. Based on interviews with weighbridge operators and security, it is known that they understand the supply chain process.

Status: Comply
3.8
Supply Chain Requirements for Mills
3.8.1

Based on the RSPO Certificate, and previous assessment until current audit the Mill only implement IP module, that only received FFB from certified unit.

3.8.2

Based on the RSPO Certificate, and previous assessment until current audit the Mill only implement IP module, that only received FFB from certified unit.

3.8.3

Estimated certified product recorded in the last assessment report and certificate, as well as in the RSPO IT Platform. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:

Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (September 2022 – August 2023) (MT)	Next Year Projected Certified Volume (12 Months) (MT)
FFB	150,421	137,968.50	140,000.00
CSPO	35,180	29,227.63	30,000.00
CSPK	6,737	5,914.59	6,000.00

Based on table above, there is no overproduction from previous license. This is because according to the license (16 December 2022 to 31 August 2023) FFB production is 103,254.08 MT, CSPO is 22,188.23 MT, and CSPK is 4,477.03 MT.

3.8.4

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

- Name of RSPO Member: PT Langgeng Muaramakmur – Bebunga Palm Oil Mill
- RSPO Membership Number: 1-0008-04-000-00 (Sime Darby Plantation Berhad)
- Name of Certified Audit: Bebunga Palm Oil Mill and Supply Bases
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO_PO1000000324
- Number of Mill: 1
- Number of Certified Estate: 3
- Type of Business: Oil Mill

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16. The company has been removed of certified stock for products sold as another scheme.

3.8.5

The company has had the SOP Supply Chain of Identity Preserve Module (SCCS-Std/RSPO/PSQM/02 rev02 dated on 22 March 2021). The procedures established and covering all elements of the supply chain model requirements in the P&C of 2018 such as the announcement in RSPO Palmtrace not later than 3 months after dispatch, receiving and recording that identify the traceability of RSPO certified and uncertified source and products (mass balance record), FFB processing, key persons and job descriptions, internal audit, training, etc. The Mill only has a single processing line. If the Mill want to change the model from IP to MB, and particularly from MB to IP, all the processing line started from loading ramp until clarification will be flushed to ensure the certified products not contaminated with uncertified products, including the storage tank will be separated completely between IP products and MB products.

The regular dissemination and training of the procedures has been conducted on 28 January 2023. Based on field observation, obtained information that key persons for SSCS implementation (such as weighbridge operators, security, and Head of Administration) have understood the supply chain implementation. The Mill has had a system to differentiate FFB from certified and uncertified sources.

3.8.6

The procedure to conduct supply chain internal audit already set in the SOP of supply chain. In the SOP mentioned that internal audit will be conducted annually. Internal audit of RSPO SCCS conducted on 15-20 August 2023 (simultaneously with RSPO P&C Internal Audit because Internal Audit RSPO P&C has been conducted in same date). All of SCCS indicators has been assessed and complied. Management Review of RSPO SCCS implementation in 2022 conducted on 04 September 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The mill has verified and documented the volumes of certified FFBs received (company used the IP Module). Certified FFB received period of 12 months before audit which is September 2022 – August 2023:

Month	FFB (ton)		Total
	Certified	Non-Certified	
Sep-22	11,948.96	-	11,948.96
Oct-22	11,455.04	-	11,455.04
Nov-22	11,310.42	-	11,310.42

Dec-22	12,199.38	-	12,199.38
Jan-23	10,593.43	-	10,593.43
Feb-23	9,003.17	-	9,003.17
Mar-23	9,961.31	-	9,961.31
Apr-23	9,275.19	-	9,275.19
May-23	14,367.94	-	14,367.94
Jun-23	12,993.14	-	12,993.14
Jul-23	13,393.87	-	13,393.87
Aug-23	11,466.65	-	11,466.65
Total	137,968.50	-	137,968.50

Estimated certified product recorded in the last assessment report. Actual certified produced has been verified during this assessment. The data are shown in the following table:

Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (September 2022 – August 2023) (MT)	Next Year Projected Certified Volume (12 Months) (MT)
FFB	150,421	137,968.50	140,000.00
CSPO	35,180	29,227.63	30,000.00
CSPK	6,737	5,914.59	6,000.00

Based on table above, there is no overproduction from previous license. This is because according to the license (16 December 2022 to 31 August 2023) FFB production is 103,254.08 MT, CSPO is 22,188.23 MT, and CSPK is 4,477.03 MT.

Related for handling non-conforming oil palm products, has been set in the Minamas Plantation Manual RSPO SCCS (No. SCCS-Std/RSPO/PSQM/02 Rev. 02 dated 06 April 2020). The complaint from stakeholder should be delivered in written and shall be responded by MR in 14 working days. During the audit, there is no written complaint from stakeholders related to nonconforming products.

3.8.8

Documentation for the Sustainable Certified Product (CSPO and CSPK), consist of daily record of the FFB acceptance, daily record of certified production, which classified as the CSPO and CSPK, certified sales record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

The mill has product information provided in such as document of contract agreement, delivery order, delivery ticket, report of loading, weighbridge ticket and other invoices for CSPO/CSPK. Documents verification and interview during an audit it was known the claimed RSPO product of (CSPO & CSPK), the supplying mill has been ensuring that the following minimum information for RSPO certified products is made available and traced, its evidenced with several supporting documents as follows delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, unique identification number, certificate number, sender's name, and address of the seller, for example:

- Shipping announcement with transaction id TR-86b4dd6b-6b84 volume of CSPO 257.73 MT, the module of SCCS IP, dated 14 March 2023, the mill can present evidence of delivery of CSPO from Bebunga Factory to PT Sime Darby Oils Pulau Laut Refinery (Contract No. 00610/LMR/KTRCPO/LOK/III/2023) which was carried out on 07-10 February 2023 with CPO Transporter is CV Nayla Makmur Jaya.
- Shipping announcement with transaction id TR-184362b1-a2a1 volume of CSPK 398.02 MT, the module of SCCS IP, dated 14 August 2023, the mill can present evidence of delivery of CSPK from Bebunga Factory to PT Laguna Mandiri – Rantau Kernel

Crushing Plant (Contract No. 00411/LMR/KTR-KERNEL/LOK/VII/2023) which was carried out on 11-31 Juli 2023 with PK Transporter is CV Nayla Makmur Jaya.

3.8.9; 3.8.10; 3.8.11

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of certified products (CPO and PK) is outsourced to the third parties and the company has its listed very well, as shows through several Work Agreement as follows:

- Agreement with CPO Transporter of CV Nayla Makmur Jaya No. 007/Pengangkutan CPO/LMR-BBF/VII/2023 dated 01 July 2023, valid thru 30 June 2024.
- Agreement with PK Transporter of CV Putra Fajar Binturung No. 011/Pengangkutan PK/LMR-BBF/VII/2022 dated 01 July 2023, valid thru 30 June 2024.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Bebunga Factory, as well as the willingness to observe by Certification Body and the company internal audit in order to verify the compliance.

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. To the auditors the company can show all the required documents covering all aspects of this RSPO Supply Chain Certification Standard requirements such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document review known that the mill still kept document according to the procedure.

For instance, record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12 months before audit (September 2022 – August 2023):

CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
September 2022 – August 2023	29,227.63	-	29,227.63

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
September 2022 – August 2023	611.17	-	28,397.61	29,008.78

The total CSPO sold as uncertified (Conventional), the company has allocated to credit stock during the last 12 months of the license period, namely from license period of 16 December 2022 – 31 August 2023 where the total CSPO that has been allocated to credit from stock is 23,020 tons (this is in accordance with the actual sales of CSPO products with other schemes during the license period). Meanwhile, for CSPO sold under other schemes in the period 16 November 2022 to 30 June 2023, stock has been allocated to credit from the license, namely 22,188.23 MT (according to actual sales in that month).

CSPK

Month	PK (ton)		Total
	Certified	Non-Certified	
September 2022 – August 2023	5,914.59	-	5,914.59

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
September 2022 – August 2023	5,574.01	-	-	5,574.01

3.8.13; 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for September 2022 until August 2023 i.e OER 21.18% and KER 4.29%. Periodically update of extraction is actual extraction.

3.8.15

The procedure of supply chain IP module has been set the mechanism to ensure the uncertified FFB not mixed with the certified FFB. The Mill only has one line of processing, and since previous assessment until the audit only implement IP module. In the transporter agreements has been set the obligation to keep the purity of IP certified products. One of the mechanisms, in the vehicle is mounted on a seal that can only be opened at the buyer's location.

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK), consist of daily record of the FFB acceptance, daily record of certified production, which classified as the CSPO and CSPK, certified sales record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Based on delivery and transaction document review, it was known that announcement is carried out less than three months after delivery date. The status of announcements has been 'confirmed' by the buyer. The supply chain PIC has known that for P&C 2018 (included supply chain standard) the announcement should be conducted within three months after the delivery date. For example:

- Shipping announcement with transaction id TR-86b4dd6b-6b84 volume of CSPO 257.73 MT, the module of SCCS IP, dated 14 March 2023, the mill can present evidence of delivery of CSPO from Bebunga Factory to PT Sime Darby Oils Pulau Laut Refinery (Contract No. 00610/LMR/KTRCPO/LOK/III/2023) which was carried out on 07-10 February 2023 with CPO Transporter is CV Nayla Makmur Jaya.
- Shipping announcement with transaction id TR-184362b1-a2a1 volume of CSPK 398.02 MT, the module of SCCS IP, dated 14 August 2023, the mill can present evidence of delivery of CSPK from Bebunga Factory to PT Laguna Mandiri – Rantau Kernel Crushing Plant (Contract No. 00411/LMR/KTR-KERNEL/LOK/VII/2023) which was carried out on 11-31 Juli 2023 with PK Transporter is CV Nayla Makmur Jaya.

Based on documents verification, it was known that the CSPO and CSPK from the Mill were sold has met the requirements of certified product information and the total CSPO sold as uncertified (Conventional), the company has allocated to credit stock during the last 12 months of the license period.

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

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

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

4.1.1

The company has established a Code of Business Conduct (signed by the Executive Deputy Chairman & Managing Director on August 2018). The document states that the Group has a responsibility to respect, support and uphold human rights as stated in the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights through commitments which include but are not limited to providing opportunities respecting freedom of association, eliminating all forms of exploitation, ensuring favorable working conditions, promoting safety and health, respecting community rights and the rights of indigenous peoples, protecting the rights of vulnerable people, protecting children's rights, and eliminating sexual violence and abuse. The Company also does not tolerate retaliation against individuals who disclose actual or suspected violations in good faith.

Based on the interview with workers in estates (harvesters, pesticide sprayers, and maintenance workers), workers in mill (mill operators and warehouse workers), as well as representatives of suppliers and contractors. They stated that there were no incidents or issues of human rights violations occurring in the operational area of the certification unit.

4.1.2

Based on the interviews with the surrounding communities, and workers, it revealed that up until recertification assessment, if there was any conflicts or disputes with the company, the resolution action taken was deliberation without involving any violences 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 the company'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; 4.2.2; 4.2.4

The unit of certification has RSPO public consultation and communication procedures with number 016/Admin-RSPO/21 dated July 1, 2021 and the protection for whistleblowers is contained in the document guidelines and procedures for reporting violations (Whistleblowing Reporting) has been socialized to the internal and external stakeholders.

In the SOP also mentioned that the company guarantees the anonymity of the reporting and the revealer of the case (whistleblower). Head of Administration is responsible for hearing and record all complaints and grievances that exist both orally and in writing from the external.

The deadline for responses to requests for information or conflicts is 2 weeks. SOP contains an explanation of communication procedures in terms of requests for information. To ensure that the procedure can be understood by employees who cannot read and write is to conduct socialization directly to all employees.

Based on the interviews with the surrounding communities, contractors, and workers, it revealed that they 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. In addition, during the past year, there were no complaints or disputes that occurred between the company and the surrounding communities.

4.2.3

Based on the documents review of the worker's grievance logbook period of 2022 to January 2023, it is known that the complaints received by the company are related to facilities. The company then showed the compliance of these complaints.

Based on the interviews with government agencies, surrounding communities, gender committees, labor unions and workers, it's known that there were no further complaints towards the unit of certification.

Status: Comply

4.3

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

4.3.1

The company has Corporate Social Responsibility Procedure No. 360/TJSL-CSR/COM dated 09 November 2015. The procedure includes stating that implementers, coordinators and implementers of CSR programs hold discussion forums with stakeholders no later than 6 months before the preparation of the annual CSR budget. Discussion forum activities are carried out based on the priority scale needed by the community with 4 main pillars, namely education, community empowerment, environment and sports - youth.

The results of interviews with village officials obtained information on aid for 2022-2023 as follows:

- Teacher honorarium assistance
- Providing heavy equipment assistance in road repairs
- Job opportunities: become a worker in the company
- Business opportunity: contractor
- Plasma & KKPA Partnership

The company carries out plasma development partnerships with surrounding villages as follows:

1. Collaboration in plasma development with the KKPA pattern (Primary Cooperative Credit for Members) SPK No. 001/PK-LMR/X/2008 dated 11 August 2008 is valid for 25 years or 30 years. Collaboration with the community of Sakadoyan Village (81.74 Ha of the target of 150 Ha) and Bakau Village (117.94 Ha of the Target of 150 Ha).
2. Handover of Sakadoyan Village Land to KKPA Management via Letter No. 140/44/KKPA/SKD/2006 dated 21 October 2006 concerning the handover of land in Sakadoyan Village, South Pamukan District to the KKPA Program Team Leader covering an area of 600 Ha.
3. Application to participate in the Oil Palm Revitalization Program from Bakau Village via Letter No. 104/UM/KDB/XI/2009 dated 11 November 2009 with a proposed area of 115 Ha in Gunung Jaring/Pematang Gumbil and 100 Ha in Keramat.
4. Plasma development management is handled separately from the core plantation and as a whole the Plasma Plantation in the Cengal River area is managed by the Cengal River Area KKPA (KKPAASC) which is headed by the Manager.
5. The development of the Sungai Cengal KKPA plasma plantation is the realization of the plantation revitalization program (Permentan No. 33/Permentan/OT.140/7/2006) concerning plantation development through Plantation Revitalization and Letter from the South Kalimantan Provincial Plantation Service No. 525/486/BUP-4 Regarding follow-up to the Plantation Revitalization program.

Facilitation for the construction of PT LMR's KKPA plasma plantations has been completed, namely in 5 villages (Sekadoyan, Bakau, Balema, Segandang, Keladen Villages) with the following details:

- Sakadoyan Village: 103 farmers, area 81.74 ha, planting year 2007.
- Bakau Village: 161 farmers, area 117.94 ha, planting year 2011

- Balemea Village: 68 farmers, area 116 ha, planting year 2014
- Segendang Village, District. Batu Engau District. Paser, farmers: 155 people, area 170 ha.
- Keladen Village: 17 farmers, area 30 ha.

Paser Regent Decree No. 525.31/KEP-341/2019 concerning the Determination of Plasma Farmer Participants in the Partnership Program between the people of Segendang Village, Kec. Batu Engau through the KUD Harapan Maju Cooperative with PT. LMR as many as 165 participants

Bina Swadaya Karya Producer Cooperative in Sakadoyan Village covering an area of 81.74 Ha in 2017 total 309.30 Ha

Based on the results of interviews with representatives Village, it is known that regular meetings with companies have been limited since the Covid-19 pandemic. However, the company still regularly attends *MUSREMBANGDES* to synergize Village programs and the social assistance that will be provided.

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 already has a HGU with an area of 16,990.75 Ha with the following details:

- Land title certificate No. 12 the year of 1997 covering 15,533 Ha
- Land title certificate No. 04 the year of 1998 covering 828.774 Ha.
- Land title certificate No. 0096 the year of 2019 covering 628.98 Ha

Of the entire area there is an area of 3,244.65 Ha which is not included in the scope of this certification (Lanting Estate) which is the supply base of Rantau POM. Thus, the scope of the certification this time is 13,746.10 Ha.

Other than HGU, the company also has an *IUP* in accordance with

- Plantation Business Registration Letter No. 461 / Menhutbun-VII / 2000 for plantations covering an area of 15,533 ha and a Bebunga mill with a capacity of 60 tons of FFB / hour.
- Approval of Re-registration of Plantation Business Permits in accordance with SK 188.45 / 386 / KUM / 2009 for plantations covering an area of 15,533 ha and processing factories with a capacity of 60 tons / hour.
- Plantation Business Registration Letter No. HK.350 / 795 / Dj.Bun.5 / XI / 2001 for Estates covering an area of 828.77 ha in Paser District, East Kalimantan (Bebunga Estate).

Regarding the *IUP* whose validity period has expired in 2019, the company has the opportunity to ensure the timeline for the process of extending the Term of Approval for Re-registration of Plantation Business Permits that have been submitted since October 4, 2019. It became OFI. Based on the results of interviews with the Plantation Agency of Kotabaru Regency, it is known that the regulations related to the timeline for extending the Re-Registration of Plantation Business Permit (*IUP*) are no longer valid because these regulations have not been in effect since 2021. Based on this, OFI is in the assessment Previously it was no longer valid and PT Langgeng Muaramakmur's Plantation Business Permit (*IUP*) is still valid today.

4.4.2

Until now there has been no area expansion carried out by the company. Initially, most of the PT Langgeng Muaramakmur area was included in the forest area and had received land release from the Minister of Forestry in accordance with SK 526/KPTS-II/1994 dated 18 November 1994 concerning the release of forest area from the Cengal River forest group and its surroundings covering an area of 16,674 ha for business cultivation of rubber and oil palm plantations.

Documents showing the presence of the FPIC process can be seen in the documentation. The compensation process for community land tenure for oil palm plantations has been carried out in stages, the details are as follows:

- Report on the payment of compensation for phase IV for Bebunga estate, Segandang Village, sub-district of. Tanjung Aru and Pamukan Utara for an area of 68.79 ha.
- The 2007 land compensation document covers the process in Segandang Village, Kec. Batu Engau covering an area of 326 ha and also in Keladen Village, Tanjung Harapan sub-district covering an area of 231 ha.
- Report on the payment of Phase I and IV compensation at Bakau Estate Betung Village and Balamea Village (1994) for a land area of 101.50 ha.
- The 2007 land compensation documents cover the process of replacing 50.08 ha of land for Harun, Aluiy, Lukman, Nuruk, Opsan and Gusti hamdan.
- Compensation in 2007 for an area of 557 Ha for 41 land cultivators from Segandang Village and Keladen Village

Records of the compensation process include Minutes of Compensation Deliberation Meetings, Receipts of compensation, statements of land rights relinquishment, and photographs of documentation. All documents are presented in the language understood by both parties and known to witnesses. With this process, it can be concluded that the agreement regarding land acquisition has been carried out and agreed by both parties. In addition, based on the interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.4.3

The company already has an operational map with a scale of 1: 60,000 which includes information on HGU boundaries, occupation areas, housing locations, block name and its boundaries, HCV areas, water sources, mill locations, and maps of planting areas. The map has shown the boundaries of the company legal rights. In addition, based on the SIA and HCV documents, it is known that there are no customary rights and other traditional rights within the PT Langgeng Muaramakmur HGU area. The entire compensation process has been completed by the company and the evidence of compensation has been verified during the Initial Certification (1st cycle certificate) assessment.

4.4.4

Until now there has been no area expansion carried out by the company. Initially, most of the PT Langgeng Muaramakmur area was included in the forest area and had received land release from the Minister of Forestry in accordance with SK 526/KPTS-II/1994 dated 18 November 1994 concerning the release of forest area from the Cengal River forest group and its surroundings covering an area of 16,674 ha for business cultivation of rubber and oil palm plantations.

Documents showing the presence of the FPIC process can be seen in the documentation. The compensation process for community land tenure for oil palm plantations has been carried out in stages, the details are as follows:

- Report on the payment of compensation for phase IV for Bebunga estate, Segandang Village, sub-district of. Tanjung Aru and Pamukan Utara for an area of 68.79 ha.
- The 2007 land compensation document covers the process in Segandang Village, Kec. Batu Engau covering an area of 326 ha and also in Keladen Village, Tanjung Harapan sub-district covering an area of 231 ha.
- Report on the payment of Phase I and IV compensation at Bakau Estate Betung Village and Balamea Village (1994) for a land area of 101.50 ha.
- The 2007 land compensation documents cover the process of replacing 50.08 ha of land for Harun, Aluiy, Lukman, Nuruk, Opsan and Gusti hamdan.
- Compensation in 2007 for an area of 557 Ha for 41 land cultivators from Segandang Village and Keladen Village

Records of the compensation process include Minutes of Compensation Deliberation Meetings, Receipts of compensation, statements of land rights relinquishment, and photographs of documentation. All documents are presented in the language

understood by both parties and known to witnesses. With this process, it can be concluded that the agreement regarding land acquisition has been carried out and agreed by both parties. In addition, based on the interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.4.5

Based on the results of interviews and document review, it is known that the community represented themselves during the negotiation process and the land compensation payment process. This can be seen from the land handover documents which are individual statements as well as receipts for payments for each person. However, all of these processes were also witnessed by parties such as representatives of the village government and representatives of land owners.

4.4.6

An annual review of the agreements negotiated in the FPIC process can be seen in the social impact assessment which is updated every year, for example the Social Impact Assessment Plan with program formulation based on the FGD in every year. Social impact assessment programs include partnership programs for farmers, human rights, programs CSR, gender equality, education and public health.

Based on the results of interviews with representatives of surrounding village, it is known that every year the company does conduct a social impact study involving stakeholders. Based on the description above, it can be concluded that the annual review related to FPIC has been covered in the corporate social impact assessment document. Otherwise, the source person also stated that the benefits obtained by the community include access to education and health, the presence of CSR, and the opportunity to have scheme smallholders.

Status: Comply

4.5

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

4.5.1

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.2

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.3

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.4

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.5

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.6

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.7

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No

00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

4.5.8

Until now the company has not expanded the area. Based on the area statement, there are immature areas, but these areas are replanting areas and not new planting. The records related to FPIC are still the same as those discussed in the Initial Certification, for example shown by the land acquisition records that are known and agreed upon by the parties. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a country that is free from the control of other parties.

Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

Status: Comply

4.6
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1

The company presented the SOP for Identification and Standard of Land Compensation (001/PSD-L&AS) dated June 3, 2011 which includes information on the stages of compensation and calculation of compensation according to the calculation standard. Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there are no problems related to the compensation process because it is based on the agreement of the parties.

There is a community area within the HGU with an enclave status, in which the area has not been released from the start to the company by the owner. This is an example of the company's recognition of community rights and a proof that there is no coercion in the land acquisition process

4.6.2

The company presented the SOP for Identification and Standard of Land Compensation (001/PSD-L&AS) dated June 3, 2011 which includes information on the stages of compensation and calculation of compensation according to the calculation standard. Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there are no problems related to the compensation process because it is based on the agreement of the parties.

There is a community area within the HGU with an enclave status, in which the area has not been released from the start to the company by the owner. This is an example of the company's recognition of community rights and a proof that there is no coercion in the land acquisition process.

4.6.3

Based on interviews with representatives of surrounding village, it is known that there is no gender-based restrictions on land ownership rights. This can also be seen from plasma participation which does not discriminate against certain genders.

4.6.4

Until now there has been no new land acquisition by the company. The compensation process is still the same as described in Initial Certification, for example in the Report on Compensation Payments Phase I and IV at the Bakau Estate, Betung Village and Balamea Village (1994) for a land area of 101.50 ha. As for the HGU certificate No 00096 issued in 2019 covering an area of 628.98 Ha, as the minutes of committee B in the HGU Decree stated that the acquisition of all land comes from a state that is free from the control of other parties. Based on the interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there have never been any problems related to the compensation process because it was based on the agreement of the parties.

Status: Comply

4.7

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

4.7.1

The company presented the SOP for Identification and Standard of Land Compensation (001/PSD-L&AS) dated June 3, 2011 which includes information on the stages of compensation and calculation of compensation according to the calculation standard. Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there are no problems related to the compensation process because it is based on the agreement of the parties.

There is a community area within the HGU with an enclave status, in which the area has not been released from the start to the company by the owner. This is an example of the company's recognition of community rights and a proof that there is no coercion in the land acquisition process

4.7.2

The company presented the SOP for Identification and Standard of Land Compensation (001/PSD-L&AS) dated June 3, 2011 which includes information on the stages of compensation and calculation of compensation according to the calculation standard. Based on the results of interviews with representatives of surrounding village, it is known that the land compensation process has occurred in the past and currently there are no problems related to the compensation process because it is based on the agreement of the parties.

There is a community area within the HGU with an enclave status, in which the area has not been released from the start to the company by the owner. This is an example of the company's recognition of community rights and a proof that there is no coercion in the land acquisition process.

4.7.3

There is no additional expansion activity until this assessment. The company only conducted compensation for the area inside the HGU.

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

Documents verifications, interview with managements and surrounding community obtained information there is no land conflict in PT Langgeng Muaramakmur The results of interviews with representatives including previous land owner of obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Customary leader, Sub district. Until the audit was carried out, there was no written complaint

from the community regarding the land dispute.

However, within the company area there is still an occupation/enclave area of 826.09 Ha. The company has identified and mapped this area and set clear boundaries. The management representative explained that the area was originally owned by the owner who was not willing to GRTT. The current condition is that there is no open conflict that hinders the company activities.

The company also has a land dispute resolution procedure which stated any problems and conflicts will be settled by mediation and deliberation, and if no agreement is reached it will be resolved through law.

4.8.2

Documents verifications, interview with managements and surrounding community obtained information there is no land conflict in PT Langgeng Muaramakmur. The results of interviews with representatives including previous land owner of obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Customary leader, Sub district. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

However, within the company area there is still an occupation/enclave area of 826.09 Ha. The company has identified and mapped this area and set clear boundaries. The management representative explained that the area was originally owned by the owner who was not willing to GRTT. The current condition is that there is no open conflict that hinders the company activities.

The company also has a land dispute resolution procedure which stated any problems and conflicts will be settled by mediation and deliberation, and if no agreement is reached it will be resolved through law.

4.8.3

Documents verifications, interview with managements and surrounding community obtained information there is no land conflict in PT Langgeng Muaramakmur. The results of interviews with representatives including previous land owner of obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Customary leader, Sub district. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

However, within the company area there is still an occupation/enclave area of 826.09 Ha. The company has identified and mapped this area and set clear boundaries. The management representative explained that the area was originally owned by the owner who was not willing to GRTT. The current condition is that there is no open conflict that hinders the company activities.

The company also has a land dispute resolution procedure which stated any problems and conflicts will be settled by mediation and deliberation, and if no agreement is reached it will be resolved through law.

4.8.4

Documents verifications, interview with managements and surrounding community obtained information there is no land conflict in PT Langgeng Muaramakmur. The results of interviews with representatives including previous land owner of obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Customary leader, Sub district. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

However, within the company area there is still an occupation/enclave area of 826.09 Ha. The company has identified and mapped this area and set clear boundaries. The management representative explained that the area was originally owned by the owner who was not willing to GRTT. The current condition is that there is no open conflict that hinders the company activities.

The company also has a land dispute resolution procedure which stated any problems and conflicts will be settled by mediation

and deliberation, and if no agreement is reached it will be resolved through law.

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

The company obtains its FFB supply from the Plasma Plantation which is fully managed by the company, namely KKPA Sungai Cengal. The prices used in purchasing FFB for Plasma use Plantation Service prices which can be openly accessed by related parties.

The company has a mechanism to convey prices using email and communication media. Based on the results of interviews with plasma farmers, the prices set by the company are in accordance with the prices set by the local Plantation Service, where if there is a price update, the company immediately conveys it via communication media and posts it on the notice board at the Cooperative office.

5.1.2

Farmers receive an explanation regarding determining the price of FFB in the Bank Plasma Plantation Management Report (KKPA-LMR) which contains: Weight of FFB; FFB Price; Income; Income Tax 22; Production cost; Maintenance cost; Administration Fees; Management Fee (5%); Loan deductions

5.1.3

The company has determined a fair price that has been agreed with the KKPA as outlined in the Cooperation Agreement Letter, in this document there is a statement that the price determined for determining the selling price of FFB is the price determined by the Plantation Service, so that the parties hereby declare that they will comply with the determination the price so that one party and the other party do not have the right to ask for an increase or decrease in the price. Because plasma management is carried out fully by the company, the resulting FFB specifications are in accordance with the required standards. Companies can show a Letter of Cooperation Agreement with Plasma Farmers which is proven based on document Number 525.31/KEP-341/2019 concerning the Determination of Partnership Program Plasma Farmers which was ratified by the Regent of Paser on April 18 2019.

Based on a review of documents and interviews with the Plasma Cooperative, it can be concluded that the company has determined a fair price which explains all components including determining the value of premiums, savings, discounts on maintenance costs and others, all of which have been agreed upon by all related parties and documented in the form of a cooperation agreement and proof of payment.

5.1.4; 5.1.5

The company can show evidence that representatives of the cooperative as plasma administrators were included in the preparation of the contract. The document contains agreements such as maintenance financing, loans/credit, repayment through FFB price cuts for the replanting program and/or other support mechanisms which have been signed by all cooperative representatives, witnesses and the company. This shows that all related parties have been involved in the decision-making process and understand the contents of the contract. The following is the MoU between PT LMR and Plasma farmers which is proven based on document Number 525.31/KEP-341/2019 concerning the Determination of Partnership Program Plasma Farmers which was ratified by the Regent of Paser on April 18 2019.

Plasma plantation development is also carried out to improve the welfare of the community around the plantation, where currently management related to plantations is still carried out entirely by company management by assigning managers and assistants to help manage plasma within their management area. Cooperatives play a role in managing the finances obtained from FFB sales

and distributing them to all their members. Cooperative members consist of people from around the company who want to be involved, not limited to men or women. Regarding the involvement of women in decision making, this can also be proven from the results of an interview with the head of the cooperative who stated that plasma land is given to all people who live in designated villages, not limited to men or women. The source stated that the contract was made with the agreement of both parties without any coercion, intimidation or discrimination.

5.1.6

The Cooperation Agreement Letter explains the procedures/system for payment of FFB sales proceeds. Payment is made based on the Minutes of FFB sale and purchase calculations which have been agreed upon and signed by all parties. Based on the results of a review of documents showing evidence of FFB payments to APKS Sungai Cengal as well as minutes of presentation of results and explanations of operational costs for the period June 2022, it shows that payments have been made on time and can be proven through payment receipts. The FFB plasma payment is valid for the period 1-31 June 2022. The payment has been supplemented with income from each farmer group, fruit tonnage and price according to the period. Based on the results of the verification of the FFB Plasma price and proof of calculations from payment recap data, it is known that the payment is in accordance with the price set by the Plantation Service. The proof of payment document also explains details of production and period costs per month, FFB production data and details of management costs, maintenance costs and fertilization costs. This document was also submitted to the cooperative through a meeting attended by representatives from the cooperative and received approval with proof of stamp.

5.1.7

The company has tested the electronic weigh bridge which was carried out on November 24, 2022 for Bebunga POM by Department of Commerce and Industry, Kotabaru Regency and valid until December 19, 2023 with evidence, among others:

- Test Result Certificate number 510.3/202-MET/DISKOPERINDAG/XII/2022 Mettler Toledo with serial number C1438037004 and maximum capacity 40,000 Kg.
- Test Result Certificate number 510.3/207-MET/DISKOPERINDAG/XII/2022 Avery Weigh with serial number 104550364 and maximum capacity 40,000 Kg.

The results of observations and interviews with weigh bridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties.

5.1.8

FFB suppliers do not come from independent farmers but rather groups of farmers who are members of the Plasma Management Cooperative with a partnership program, namely KKPA Sungai Cengal. Cengal River KKPA has RSPO certification and is affiliated with the Plantation Group in the name of PT. Independent Lagoon.

Based on this, the certification unit as a group of companies has supported independent farmers with certification, even though its management is currently still fully managed by the company.

5.1.9

The mechanism, open to all affected parties and resolve disputes management in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers (where requested) are presented in their procedures SOP for Community Complaints Handling and SOP for Worker Complaints Handling. Based on the procedure all complaint submitted to Division Assisstant and written in the register book, the SOP has been explain related on the secrecy of whistleblower. In the procedure was not explained explicitly about the way in submitted the complaint through the RSPO Complaints System, however based on interview with labor union it was mentioned that the complaint submission through RSPO was understood. Based on internal and external stakeholder consultation (to the workers, Labor Union, Gender Committee, local contractor, Head of Sebangau Village, Head of Cooperative of Bina Swadaya, and Head of Pamukan Utara Sub-District), known that the stakeholders already known the mechanism of consultation, or to submit complaints and grievances, and the mechanism is accepted and considered effective for them.

Status: Comply	
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	
5.2.1 <p>The results of interviews with the company stated that currently all FFB suppliers do not come from independent farmers but rather groups of farmers who have joined the Plasma Management Cooperative with a partnership program, namely KKPA Sungai Cengal. The company also stated that the Sungai Cengal KKPA has RSPO certification and is affiliated with the Plantation Group in the name of PT Laguna Mandiri. Based on this, the certification unit as a group of companies has supported independent farmers with certification, even though its management is currently still fully managed by the company.</p>	
5.2.2 <p>The company has improved the welfare of communities around the plantations by building and fully managing plasma plantations and regularly conducting outreach regarding RSPO certification. Currently, Plasma management is not yet fully managed by the cooperative management, the company is still providing assistance to ensure that the management of oil palm cultivation complies with RSPO standards. Apart from that, companies can also show socialization documents regarding best practices for palm oil cultivation, work safety, environment, fire, RSPO benefits, and recommendations for registering with RSPO which was carried out on February 2 2022 which was delivered to plasma farmers attended by 17 participants.</p>	
5.2.3 <p>The results of interviews with the company stated that currently all FFB suppliers do not come from independent farmers but rather groups of farmers who have joined the Plasma Management Cooperative with a partnership program, namely KKPA Sungai Cengal. The company also stated that the Sungai Cengal KKPA has RSPO certification and is affiliated with the Plantation Group in the name of PT Laguna Mandiri. Based on this, the certification unit as a group of companies has supported independent farmers with certification, even though its management is currently still fully managed by the company.</p>	
5.2.4 <p>The management of plasma plantations was fully managed by the Company. The company showed a report document on the implementation of Refresh competency & spray safety, pesticide handling and buffer zone socialization which was carried out on May 16 2023, which was attended by plantation assistants, spray foremen and spray employees. This activity discusses the completeness of PPE, the work flow of the BSS team, HIRAC socialization and the work sequence for managing B3 waste from pesticides.</p>	
5.2.5 <p>The certification unit can show evidence that it has publicly reported support programs for farmers, especially plasma farmers, regarding their progress on a regular basis. Evidence shown is based on the receipt of the 2022 Semester 2 LKUP submission document to the Kotabaru Regency Agriculture Service on May 22 2022 as well as the 2022 CSR Report which can be accessed by the public.</p>	
Status: Comply	
PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS	
6.1 Any form of discrimination is prohibited.	
6.1.1 <p>The company had a policy concerning the ethical codes in all operational activities and transactions. This policy is stated in the Sime Darby Plantation Group Code of Conduct updated in December 2021. This policy generally explained that the company</p>	

seeks to prevent discrimination in the workplace, stated specifically as follows:

- The Group provides equal opportunities in work requirements by only providing the equal requirements, and seeking the ability and expertise of workers.
- Respect for diversity, and prevent discrimination against gender, race or ethnicity, disability, sexual orientation, beliefs, and nation, unless if there was a specific regulation stated the recruitment in a certain criterion.

Based on the workers' recruitment document and interviews with the workers, The company 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, informed that women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work.

6.1.2

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

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators, etc), 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. In addition, it was also conveyed that workers never feel asked to make any payments 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 included evaluation of skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of the worker as well. Records on manpower procedure had been documented, as verified randomly to the several documents, here as follows:

- Job applications for workers with the initials MES along with other complete documents until the signing of the PKWT work agreement number 08/03/PKWT-BBF/03/2023 dated March 1 2023.
- Record of performance evaluation and promotion of 8 top class workers (laboratory foreman, process foreman, head of electrical mechanic, head of security, grading foreman and clerk) in 2022.

6.1.4

Based on the results of interviews with representatives of the gender committee (All Unit) and female workers, for example during audit activities, it was stated that the company has provided equal opportunities to all workers and there have been no discriminatory acts carried out by the company such as pregnancy tests. This is done only to ensure that workers who handle chemicals are not pregnant so they can be transferred to other jobs that are not related to chemicals.

6.1.5

The company can show the gender committee structure which informs that the structure includes gender representation (male and female). Then, based on the results of interviews with workers, information was also obtained that workers had an understanding regarding the existence and function of gender committees.

6.1.6

Based on the results of interviews with workers, for example in upkeep activities at GKE, it was stated that the company has provided equal wage payments for maintenance activities. In addition, based on the results of interviews with security workers at Mill, it was stated that the wages of security workers are differentiated based on groups classified based on years of service and assessment results. This is in accordance with the results of a study on salary slip documents for July 2023, for example the power supply worker with the initial "L" who join on 2022 received a higher base wage than the worker with the initial "H" who joined on 2004.

Status: Comply

6.2

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

6.2.1

The company has regulations regarding minimum wages in accordance with statutory provisions and company regulations. The following are regulations set by the government along with separate determinations from companies regarding minimum wages in 2023, including:

- 188.44/0842/KUM/2022 concerning Regency/City Minimum Wages for 2023 in the South Kalimantan Province Region. In this document, it is explained that the Minimum Wage for Kotabaru Regency in 2023 is IDR. 3,293,371.38.
- Inter-office Mail Number 010/HRM-i5.1/SUSU/I/2023 concerning the Structure and Scale of Wages for SKU Workers for PT BSS, PT LMI, PT SAA, PT LMR and PT PSA for 2023, published on January 2 2023. The document explains that the wages of PT LMR workers in 2023 will not be lower than the Kotabaru Regency Minimum Wage. In addition, the Company has determined a wage scale structure with the lowest division being group H and the highest being group A8.

Based on the results of a review of workers' wage documents for July and August 2023 for harvest work (initials RDT), and processes at the Mill (initials L), it is known that these documents are available in Indonesian which explain the income and deductions received by workers and that workers have received wage payments are not lower than the 2023 Kotabaru Regency Minimum Wage determination.

Then, based on the results of interviews with workers at both the Mill and Estate, information was obtained that the workers had understood the information contained in the pay slip document. Thus, it is concluded that the company has documentation of wages and work conditions in accordance with the labor provisions that apply to workers in the national language, along with explanations to workers in a language they understand.

6.2.2

Companies can show examples of Work Agreement Letters (SPK) documents for both workers with permanent status (PKWTT) and non-permanent workers (PKWT). for example, the PKWT work agreement with the initials MNK was signed on July 10 2023. This agreement is valid from July 11 2023 to July 10 2024 with the position as a separate pruning gang employee.

The work agreement document shown is made in Indonesian and contains information including the name of the person acting as management representative and company address, worker information in the form of name and other personal information, worker position, employee work location, reporting, work duties and responsibilities, work agreement period, salary and other benefits. The SPK document has been signed by representatives of management and workers.

The company also shows supporting documents indicating that the company has provided a copy of the work agreement document in the amount of 1 (one) copy to the worker. This is shown in the form of a document receiving a copy of the work agreement. Based on the results of interviews with workers, the company has provided a copy of the work agreement document at the beginning of hiring workers. Apart from that, workers also understand the contents of the work agreement.

Based on the description above, the company has provided copies of employment relationship documents to workers in accordance with applicable employment regulations.

6.2.3

Collective Labour Agreement (CLA) for period of 2022-2024 dated July 16, 2022. The CLA has covers regulation reference, company policy, work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others.

Companies can show documentation of legal compliance evidence for regular working hours, deductions, overtime, sick leave, right to holidays, maternity leave, reasons for dismissal, notice period before dismissal, and other employment provisions. For example:

- Annual leave application form for workers with the initials SN who apply for 18 days of leave from the total remaining leave entitlement of 18 days. The application was submitted on July 7, 2022 and was approved by the Seed Assistant on April 4, 2023
- Maternity leave application form for workers with the initials ESU who request maternity leave for 45 days before giving birth and 45 days after giving birth. The application was submitted on 01 August 2022 and was approved by the Traction Division Assistant on 01 August 2022
- Overtime request document for workers with the initials H (factory power supply operator) who have a total of overtime hours in August 2023 of no more than 18 hours per week. This document has been signed by the worker concerned and approved by his/her leadership.
- Overtime request document for workers with the initials L (factory power supply operators) who have a total of overtime hours in August 2023 of no more than 18 hours per week. This document has been signed by the worker concerned and approved by his/her leadership.

6.2.4

Based on the results of field observations, information was obtained that the Company has provided facilities and infrastructure for worker welfare including: workers' housing facilities, religious facilities (houses of worship), sports facilities, health facilities in the form of clinics, clean water facilities, electricity facilities from PLN, daycare and others.

Currently, all welfare facilities provided in general are in decent condition and can be used by workers and their families. The company also has a maintenance program for worker welfare infrastructure as stated in the Employee Housing Condition and Employee Welfare Facilities Checklist document. This document explains the monitoring and improvement plan for existing welfare facilities every year in accordance with the established budget.

Based on the results of field observations in the factory housing area and Bebunga Estate, the welfare facilities provided are in decent/good condition, the worker's house consists of 2 bedrooms, 1 bathroom and kitchen, clean water is provided every day, electricity is provided by the company, prayer facilities are in the form of mosques and churches, and other facilities. Clinics are available as worker health facilities that can be accessed by workers and their families. This is supported by the results of interviews with housing residents who stated that the housing facilities provided are in decent condition, one house is occupied by 1 head of family and so far, if there are complaints from workers regarding housing facilities, the company will respond to them and make improvements as soon as possible. .

In accordance with the description above, it can be concluded that the company has facilities and infrastructure for worker welfare that are in decent condition and can be accessed by workers and their families.

6.2.5

Company has supported the existence of employee cooperative, that provides daily household need especially for food in decent, fairly and at affordable prices. In addition at the time of wage payment there are temporary market comes from surrounding communities. Moreover, the traditional market are near from housing complex in several location such as Pasar Lintang Lima,

Pasar Lintang Baru, Pasar Bakau and Pasar Rampa Cengal. In addition, traders who are allowed to sell in a residential area make it easier for workers to access food sources. This matter has been verified through consultation with Head of Employee Cooperative, Labor Union, as well as housing residents.

Based on interviews with estate and mill workers, labor unions and gender committees, it's known that workers have no difficulty in getting food sources because the workers can buy these needs to the markets around the company's area without any difficulties and the distances not to far about 15 minutes riding a motor cycle and the farthest is about 15 km.

6.2.6

The standard of wage eligibility referred to by the unit of certification is the Kotabaru Regency minimum wage. A detailed explanation of the district minimum wage is provided in indicator 6.2.2. The Living Wages Benchmark for Indonesia has not yet been determined, however, the company has simulated the Prevailing Wage calculation. The components included in the calculation of a living wage include allowance, rice, housing, electricity and water, education transport, health include transport, and assurance. The calculation above is for per month so the total in-kind benefit for each worker per month and the calculation base on regular price in the area.

6.2.7

Based on the results of a review of the employee list documents for August 2023, it is known that there is still use of *PKWT* workers employed, namely in the harvest work during the peak season and maintenance. Based on document review, it is known that all permanent work is carried out by permanent workers (*PKWTT*). This is in line with the sample of workers interviewed by auditors in the field.

Based on the results of interviews with the Kotabaru Regency Manpower and Transmigration Service, it is known that the company has reported the use of *PKWT* regularly. For example:

- Report on the use of PT Langgeng Muara Makmur's *PKWT* to the Manpower and Transmigration Service of Kotabaru Regency on July 14 2023, a number of 3 workers.
- The report on the use of *PKWT* Bebunga Estate workers to the Manpower and Transmigration Service in Kotabaru Regency on January 5 2023 was 1 worker.

Thus, it is concluded that all work of a permanent nature is not carried out by workers for a certain period of time.

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; 6.3.2

The company has a policy regarding the formation of labor unions which is stated in the Social Policy document published in December 2011 and signed by the Head of Plantation Upstream Indonesia. This policy explains the company's commitment to giving workers the freedom to form trade unions.

Based on the results of interviews with the trade union, the company has facilitated workers in forming a trade union by providing facilities in the form of a room for trade union activities and not intervening in trade union activities. The results of interviews with workers revealed that trade union membership is voluntary.

The company has a workers' union which is part of the Minamas Plantation Workers' Union Federation as a forum for workers to convey their aspirations to the company. There are 4 labor Union at the company, the following is an example of a Labor Union formation document:

- Proof of registration of the labor union at Bebunga Estate with Registration Proof Number 568/257/Disosnakertrans on 21 September 2012.
- Proof of registration of the labor union in Bakau Estate with Registration Proof Number 568/76/Disosnakertrans on 26 October 2007.
- Proof of registration of the union at Sungai Cengal Estate with Registration Proof Number 568/52/Disosnakertrans on March 13 2012.
- Proof of registration of the trade union at Mill Bebunga with Registration Proof Number 568/32/Disosnakertrans on July 25 2011.
- Proof of recording changes in the management of Mill Bebunga with Recording Proof Number 568/284/HIJSK/2021 on November 16 2021.
- Proof of recording changes in the management of Sungai Cengal Estate with Recording Proof Number 568/77/Naker-2/2018 on February 8 2018.
- Changes to the composition of the management of the Bebunga Estate Workers Union for the period 2021 – 2024 number 568/289/HIJSK/2021 dated 9 December 2021.

The company also showed documents of internal trade union meetings and bipartite meetings, for example the meeting on January 26 2023 between the Sungai Cengal Estate Workers Union and the Company regarding employee layoffs.

6.3.3

Based on a labor union structure review, as well as an interview with employees on the estate and mill, it was known that union organization is consist of Chairman, Deputy of Chairman, Secretary, Treasurer, etc. All labour union committee members were employee which is not involved in company structural organization (staff up). Based on interviews with worker union representatives revealed that the certification unit fully supports all organizational activities without any intervention.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The certification unit has a social policy that was approved by the Head Plantation Upstream Indonesia in December, 2011. The policy regulates the basic principles of human rights protection such as:

- Every staff/employee must be treated fairly in matters relating to recruitment, promotion, limitations and working conditions without regard to personal issues such as race, level, ethnicity, gender, skin color, physique, organizational membership, political views, religion and age.
- Identify potential social benefits through good communication to enhance positive reciprocal relationships between the company and the local community.
- Ensure that all negotiations regarding compensation for loss of rights are carried out in a good and documented system to enable local communities and other interested parties to express their views through their representative institutions in accordance with applicable laws and customary rights.
- Develop and implement a policy to prevent sexual harassment and other forms of crime against women and protect the reproductive rights of women workers.
- Respect the rights of every employee to form and join trade unions of their choice and to bargain collectively.
- Indonesian upstream plantations are not allowed to use forced labor or underage labor (child labor).

This policy has been socialized to all employees in each estate, mill and also contractor that stated in the work agreement.

Based on list of worker document review, field observations and interviews with estate and mill workers revealed that there were no child laborers on site, further explained that the certification unit is prohibited from employing children or helping their parents work

on site.

6.4.2

The certification unit shows a list of employees accompanied by the date of entry and date of birth. In addition, an example of proof of recruitment is also shown in the form of a copy of the employee's ID card and family card. From these data, it is known that there are no employees under 18 (eighteen) years of age when accepted to work at the certification unit.

Based on field observations, document observation and interviews with an estate, mill, and contractor employees revealed that there were no employees under the age of 18 (eighteen) when they started working.

6.4.3

Based on document verification list of employee August 2023 in PT Langgeng Muara Makmur (estates and mill) then also field observations revealed that in the last 1 (one) year there were no apprentices in the certification unit's operational areas and there are no employees in the young worker category.

6.4.4

The company has a policy of prohibiting employment of minors as stated in the Social Policy published in December 2011 and signed by the Head Plantation Upstream Indonesia. As stated in the Social Policy and Collective Labor Agreement, the minimum age limit for workers is 18 years. Based on the list of employees for the 2023 period, it is known that none of the workers were under 18 years old when they first started working.

As a form of outreach, warnings have been posted informing people of these prohibitions, including the prohibition on children being at work sites

Based on the results of field visits to harvest work and press stations, it is known that there are no child workers. Results of interviews with worker representatives such as gender committees and trade unions. There was also never any issue regarding child labor.

Based on document verification list of employees August 2023 in PT Langgeng Muara Makmur (estates and mill) then also field observations revealed that in the last 1 (one) year there were no apprentices in the certification unit's operational areas and there were no employees in the young workers category.

Thus, it can be concluded that the company has implemented a policy prohibiting the employment of underage children.

Status: Comply

6.5

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

6.5.1; 6.5.2

The certification unit has a social policy that was approved by the Head Plantation Upstream Indonesia in December, 2011. The policy regulates the basic principles of human rights protection such as

- Every staff/employee must be treated fairly in matters relating to recruitment, promotion, limitations and working conditions without regard to personal issues such as race, level, ethnicity, gender, skin color, physique, organizational membership, political views, religion and age.
- Identify potential social benefits through good communication to enhance positive reciprocal relationships between the company and the local community.
- Ensure that all negotiations regarding compensation for loss of rights are carried out in a good and documented system to enable local communities and other interested parties to express their views through their representative institutions in accordance with applicable laws and customary rights.

- Develop and implement a policy to prevent sexual harassment and other forms of crime against women and protect the reproductive rights of women workers.
- Respect the rights of every employee to form and join trade unions of their choice and to bargain collectively.
- Indonesian upstream plantations are not allowed to use forced labor or underage labor (child labor).

Based on field observation and interviews with women workers in estate and mill revealed that the certification unit had given women workers 2 (two) days of menstrual leave based on doctor permit letter and 3 (three) months of maternity leave. Further explained that so far there has never been a problem in applying for menstrual or maternity leave.

6.5.3

The company has identified the needs of new mothers which was carried out on March 25 2022, the results of the assessment are as follows:

- Facilitate a room for breastfeeding mothers in childcare
- Facilitate the provision of education regarding the importance of breastfeeding by doctors or midwives
- Providing education on the impact of domestic and child violence by doctors
- Implementation of an immunization program

Discussions on identifying the needs of new mothers have involved the gender committee, housewife representatives and company staff.

6.5.4

The complaint handling mechanism and the system is described in the SOP mechanism for handling complaints for all parties and the community No. 03/Masy-KSP/3/15 dated March 1, 2015. Complaints can be submitted through recording in the logbook that has been provided, directly to the foreman, through the suggestion box, through the gender committee, worker unions, hotlines and email provided by the certification unit and via the RSPO website.

Based on interviews with women workers in field observation and gender committees, it is known that they understand the related policies. it was further explained that so far there have been no problems or complaints related to reproduction in the workplace and they all know the mechanism to file a complaint.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on interviews with operational staff revealed that all employees were those who passed the recruitment and selection process according to certification unit procedures and requirements. The certification unit post job vacancies then prospective workers come voluntarily to apply for jobs that are available for free and there is no holding of identity documents. Overtime is monitored by the certification unit and workers are given the freedom to choose overtime. The certification unit also does not force or make it difficult for employees to resign. There is no penalty for termination if they wish to terminate the contract early.

Based on verification document, field observation, and interviews with workers and stakeholders, auditors did not see any harvester accompanied by their wife or children and any indication of forced labor. There is no threat against family members. Based on document verifications and field observations in spraying and harvesting activities at Estate and Mill operations activities, there were no forms of forced or trafficked labor are used.

6.6.2

Based on the results of interviews with management representatives, information was obtained that there was the use of foreign workers with positions as Agronomy Director and Mechanical Advisor. In this regard, companies can show their licensing

documents which are still valid starting from the Ratification of the Plan for the Use of Extended Foreign Workers at PT Langgeng Muara Makmur which was determined on October 18 2022 which is valid until January 31 2024.

Then, workers with PKWT status have been equipped with a work agreement letter explaining the workers' employment rights and obligations.

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 showed the South Kalimantan Provincial Manpower and Transmigration Decree No. 566/8.153/2022 dated 26 May 2022 concerning the determination of PT LMR's P2K3. The composition of the P2K3 management consists of a chairman with the initials AR, a deputy with the initials R and a secretary with the initials AS.

The P2K3 Secretary appointed in the management structure has attended the General OHS Expert Certification Training from the Ministry of Manpower of the Republic of Indonesia which was carried out by the PJK3 organizers. The company shows the Republic of Indonesia Minister of Manpower Decree No. 5/9567/AS.02.04/X/2020 concerning the Appointment of General AK3, dated 19 October 2020 which is valid for 3 years.

P2K3 meetings have been held regularly every month with discussions on OHS issues and follow-up, for example the P2K3 meeting on 26 August 2023 at the BKE headquarters with discussions regarding, among other things, repairing and maintaining APAR houses, replacing empty APARs, and procuring and purchasing the contents of first aid boxes.

6.7.2.

The company has an emergency response organization, for example shown for Bebunga Estate with the following details:

- Advisor
- Chairman
- Vice Chairman
- Traction Team
- DIV 1 Team
- Div 2 Team
- Div 3 Team
- Div 4 Team

The company has established an emergency response system referring to emergency preparedness and response and recovery procedures regarding prevention, handling and recovery of emergencies in document number 7300/PSQM-ESH/12 revision 01 concerning occupational safety and health procedures in points 21 and 22 regarding response emergency and fire prevention.

From the results of interviews with employee representatives and field visits, it is known that personnel understand the technicalities and procedures related to emergency response preparedness and control procedures and understand how to use the tools used in the procedures. Based on the results of field observations in the plantation, for example during harvesting, pruning, manual maintenance and factory visits, the company also provides first aid bags for each work foreman and first aid boxes at several points that are easy for workers to access in the factory, which is in accordance with applicable laws and regulations.

The company has fire facilities and infrastructure as indicated in the facility and infrastructure document for preventing and controlling land and plantation fires, which was last inspected in June 2023. Based on this document, it is known that the available fire control facilities and infrastructure at PT Langgeng Muaramakmur are as follows:

- Personal equipment such as 75 headlamps and 63 safety glasses.

- Team equipment such as 11 overnight tents and 8 first aid kits.
- Hand tools such as 22 dual-purpose axes and 28 sharp rakes.
- Water pumps and equipment such as 6 units of high pressure pumps and 15 units of portable pumps.

Apart from that, during field visits, for example to factories, there is a map of the company floor plan along with the position of the APAR and when traced, the APAR is indeed located according to the map and in the condition that the needle is in the green area.

6.7.3

The company showed the Occupational Safety & Health Policy policy document which was signed by the Head of Plantation Upstream Indonesia in December 2011. This document briefly contains the occupational safety & health management system, creating safe conditions in the workplace, providing adequate training for staff and employees, and improving occupational safety and health management.

As a result of interviews with maintenance workers, it was found that these personnel understood and could explain the procedures set by the company and based on visits to BSS's house it was also known that the BSS house was in a clean and tidy condition.

6.7.4

The company has a list of workers which also includes BPJS Employment and BPJS Health participant numbers along with proof of payment for all units and it's concluded that all workers has provided with BPJS Health and BPJS Employment. For example, for Bebunga Factory and Bebunga Estate units in August 2023 as follows:

Unit	Description	Workers
BBE	Number of workers	447
	Number of BPJS Health participants	477
	Number of BPJS Employment participants (Permanent workers)	409
	Number of BPJS Employment participants (temporary workers)	78
BBF	Number of workers	120
	Number of BPJS Health participants	120
	Number of BPJS Employment participants (Permanent workers)	103
	Number of BPJS Employment participants (temporary workers)	17

Based on the results of interviews with Mill and Estate workers, it is known that the company has provided health insurance to workers and their families (wives and children) and employment guarantees to all workers.

Based on the above, it can be concluded that the company has a list of employees who take part in the Employment and Health Social Security Administering Agency (BPJS) program along with proof of payment every month.

6.7.5

Work accidents are recorded using the Lost Time Accident (LTA) listed in the Lost Time Accident KSP document for January-August 2023, which among others explains the number of accident cases, the number of days lost, Frequency Rate (FR) and Severity Rate (SR), among others as follows: following:

UNIT	WORK HOUR	CASE	FR	SR
BBE	674.114	28 with lost working days 26	42	39
SCE	647.115	-	-	-
BKE	403.235	-	-	-
BBF	145.796	-	-	-

From the document above, it can be seen that Bebunga Estate only had a loss of working days due to fatalities in the estate. Based on the description above, it can be stated that the company has recorded the loss time accident.

Status: Comply

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

7.1

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

7.1.1

Based on the Agronomy Reference Manual document Number 110/EST-ARM/13 dated 1 September 2013 which was ratified by the Head of Plantation Upstream Indonesia in section 15 shows procedures related to technical observation and control of pests which includes discussing:

- Horn beetles on immature
- Chemical control of common oil palm pests
- Control of bagworms and fireworms
- Use of plants is useful for natural control of leaf pests
- Control of rats in oil palm plantations
- Utilization of owls to control rat pests
- Control of root rot and stem end rot (ganoderma)
- Certification of best work practices to minimize ganoderma inoculum in replanting
- Use of abruscular mycorrhizal fungi to control root rot disease (ganoderma)

The company shows records of the implementation of OPT observations and controls, including:

- Based on beneficial plant monitoring documents, for example monitoring reports up to August 2023, it is known that the company has utilized beneficial plants as part of the implementation of integrated pest control, including *Cassia Cobanensis*, *Antigonon leptopus* and *Turnera subulate*.
- Based on monitoring documents for owl cages in June 2023 at the Bebunga plantation, it is known that the company has used *Tyto alba* as a biological pest control method with a total of 52 owl cages. From the document review, it can be seen that several gupons were in a damaged condition and the total number of owls after the census was 19 owls.
- Based on pest census records, for example oryctes on August 12 2023, it is known that there were pest attacks with high attack criteria, namely 6.92%. From these results, the company then sprayed using the active ingredient Carbosulfan and monitored the effectiveness of this control.

7.1.2

Based on monitoring documents for beneficial plants, for example monitoring reports up to August 2023, it is known that the company has utilized beneficial plants as part of the implementation of integrated pest control, including *Cassia Cobanensis*,

Antigonon leptopus and Turnera subulata.

Based on monitoring documents for owl cages in June 2023 in the Bebunga plantation, it is known that the company has used Tyto alba as a biological pest control method with a total of 52 owl cages. From the document review, it can be seen that several gupon are in damaged condition and the total number of owls after the census is 19 owls.

Based on the regulations in force in Indonesia, it is known that this species is not an invasive species.

7.1.3

Based on the Agronomy Reference Manual document Number 110/EST-ARM/13 dated 1 September 2013 which was ratified by the Head of Plantation Upstream Indonesia in section 15 shows procedures related to technical observation and control of pests which includes discussing:

- Horn beetles on immature
- Chemical control of common oil palm pests
- Control of bagworms and fireworms
- Use of plants is useful for natural control of leaf pests
- Control of rats in oil palm plantations
- Utilization of owls to control rat pests
- Control of root rot and stem end rot (ganoderma)
- Certification of best work practices to minimize ganoderma inoculum in replanting
- Use of abruscular mycorrhizal fungi to control root rot disease (ganoderma)

Based on document reviews and interviews with management and workers, there is no control was found using fire, but using an ecological, biological, physical and chemical approach.

Status: Comply	
-----------------------	--

7.2

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

7.2.1

Based on the Agronomy Reference Manual document Number 110/EST-ARM/13 dated 1 September 2013 which was ratified by the Head of Plantation Upstream Indonesia in section 15 shows procedures related to technical observation and control of pests which includes discussing:

- Horn beetles on immature
- Chemical control of common oil palm pests
- Control of bagworms and fireworms
- Use of plants is useful for natural control of leaf pests
- Control of rats in oil palm plantations
- Utilization of owls to control rat pests
- Control of root rot and stem end rot (ganoderma)
- Certification of best work practices to minimize ganoderma inoculum in replanting
- Use of abruscular mycorrhizal fungi to control root rot disease (ganoderma)

Based on pest census records, for example oryctes on August 12 2023, it is known that there were pest attacks with high attack criteria, namely 6.92%. From these results, the company then sprayed using the active ingredient Carbosulfan and monitored the effectiveness of this control. Based on the review of these documents, it is known that the company has used registered pesticides and has not used restricted pesticides.

TYPE	Active Ingredients	NO. PERMISSION	VALIDITY PERIOD
Antracol 70 WP	Propineb	RI 010201197474	18 October 2025
Agristik	Perekat	RI 01020120124006	13 July 2024
Basta 150 SL	Amonium Glufosinate	RI 01030120175826	06 Oktober 2025
Capture 500 EC	Cypermethrin	RI 01010120011636	12 December 2025
Marshal 5GR	Karbosulfan	RI 010101200001545	04 October 2024
Kenrane 288 EC	FLuoroxypyr	RI 01030120175849	14 October 2026

Based on field visits, for example at the Bebunga warehouse, it is known that the pesticides stored in the warehouse are in accordance with the list and records of pesticides provided by companies such as Metaprima, Basta, and Marshal.

7.2.2

Documentation of the recording of pesticide use in monitoring the use and toxicity of pesticides for the period January-December 2021, such as:

Bakau Estate

Trademark	Dosis Rek. Label	LD 50	Active Ingredient	Total Material Utilization	Total Ha	Active Ingredient / Ha
Supremo 480 AS	2-3 l/ha	2.400	480 gr/ltr	4.226 ltr	3.453	587
Basta	1,5-2,25 l/ha	484	280 gr/ltr	842 ltr	1.067	221
Centalon	1-2 l/ha	960	480 gr/ltr	495 ltr	2.253	105
Meta Prima 20 WDG	50-70 gr/ha	500	20%	275 kg	3.453	0,02
Kencis 50 AC	1,5 ml/l	100	50 gr/ltr	212 ltr	799	13
Capture	1,5 ml/l	125	50 gr/ltr	675 ltr	1.860	18

Bebunga Estate

Trademark	Dosis Rek. Label	LD 50	Active Ingredient	Total Material Utilization	Total Ha	Active Ingredient / Ha
Basta	1,5-2,25 l/ha	484	280 gr/ltr	130 ltr	260	140,00
Meta Prima 20 WDG	50-70 gr/ha	500	20%	280 kg	2.985	0,02
Capture	1,5 ml/l	125	50 gr/ltr	117 ltr	2.985	1,96
Marshal	5 gram/ Pkk	100	5%	1.916 kg	2.737	3,50
Kenrane 288 EC	1-2 l/ha	576	288 gr/ltr	398 ltr	796	144,00
AMM	1,5-2,25	560	280 gr/ltr			

Lifeline 280 SL	l/ha			1.258 ltr	2.516	140,00
-----------------	------	--	--	-----------	-------	--------

7.2.3

The company showed documents recording pesticide use for the 2021-2022 period to PT Langgeng, including the following:

No.	Pesticide	Unit	2021	2022
			Qty	Qty
1	BASTA 15	Liter	258,00	4.204,00
2	Capture	ltr	2.297,34	4.634,60
3	Centalon 480 EC	Liter	1.810,39	741,64
4	CYPERMETRIN	Liter	3.222,00	117,00
5	Gallant 108 EC	ltr	21,00	3.122,00
6	KENCEPAT 75SP	Kg	2.475,17	13,94
7	KENRANE 288EC	Liter	484,78	431,00
8	LIFELINE 280 SL	Liter	4.182,00	3,02
9	MARSHAL 5G	Kg	13.105,89	4.819,11
10	METAPRIMA 20 WDG	Kg	1.282,15	762,39
11	PRIMA UP 480 AS	Liter	27.146,17	20.821,30
12	Racumin	Kg	2.876,59	528,41

Based on a review of documents on pesticide use, it is known that there has been a reduction in the use of pesticides, for example on Prima up, Racumin and Marshal. Based on the results of document reviews and field visits, it is known that the company has utilized beneficial plants such as antigonon and natural enemies of rat pests such as owls.

7.2.4

Based on field observations and document verification, it can be show that the company does not use pesticides prophylactically to control plant pests and diseases because based on interviews with management representatives, before using pesticides, a census will be carried out first, and if the census results exceed the threshold, then pesticide use will be carried out.

7.2.5

The company shows the policy regarding pesticide mitigation contained in the Memorandum dated 20 December 2022 regarding the policy to reduce the use of class 1A and 1B pesticides which was signed by the Area Controller explaining that all business units at PT LMR are required to always evaluate and control the use of class 1A and 1B pesticides. seriously and sustainably, so that the LMR area can have zero use of class 1A and 1B pesticides.

The company also shows documents on the use of pesticides used by the company during 2021-2023. The document explains the

name of the pesticide, active ingredient, LD50, registration number, distribution permit date, and the amount of pesticide used. Based on the document, it is known that the company does not use pesticides with the active ingredient paraquat. Based on field visits, for example at the Bebunga warehouse, it is known that the pesticides stored in the warehouse are in accordance with the list and records of pesticides provided by companies such as Metaprima, Basta, and Marshal.

7.2.6

The pesticide packaging storage procedure Number 01/KSP-Pesticide/10/2020 which explains as follows:

- In point 5.2, pesticides must be stored in a safe place (locked warehouse), separate from fertilizers, foodstuffs, and water sources.
- In point 5.3, each type of pesticide must be placed separately according to its respective group, namely herbicides, fungicides, rodenticides and insecticides.

The company showed a report document on the implementation of Refresh competency & spray safety, pesticide handling and buffer zone socialization which was carried out on May 16 2023, which was attended by plantation assistants, spray foremen and spray employees. This activity discusses the completeness of PPE, the work flow of the BSS team, HIRAC socialization and the work sequence for managing B3 waste from pesticides.

7.2.7

The pesticide packaging storage procedure Number 01/KSP-Pesticide/10/2020 which explains as follows:

In point 5.2, pesticides must be stored in a safe place (locked warehouse), separate from fertilizers, foodstuffs, and water sources. In point 5.3, each type of pesticide must be placed separately according to its respective group, namely herbicides, fungicides, rodenticides and insecticides.

Based on field visits and interviews with officers in the warehouse area, for example at Bebunga Estate, it was seen that the pesticides had been stored properly and were not lying around anywhere. officers also understand how to manage well based on MSDS and HIRAC.

7.2.8

The company has storage and handling documents for B3 Waste in the form of LB3 Logbook and Balance Sheet

PT LB3 Management Report. LMR Mill Bebunga for the April-June 2023 period includes: Used B3 packaging 1,464 Kg

The company has proof of delivery of LB3 to a Transporter licensed by PT. Balikpapan Environmental Service as follows:

- Cargo Waste Transfer CWT 009118 dated 04-05-2023 KT Truck 8986 K. Used Oil 7 drums, used B3 packaging 10 drums, used filter 3 drums, used Accu 4 drums
- Cargo Waste Transfer CWT 008935 dated 04-05-2023 Truck KT 8767 LN. Used B3 packaging, TL lamps, used filters, used Majun cloth.

The company has made improvements based on field findings as evidenced by several documents, including:

- Documentation of repairs to Hazardous Waste, in this document there is evidence of repairs and justification in the form of minutes of socialization regarding the definition of Hazardous Waste, the potential dangers of used waste and socialization of Hazardous Waste storage areas. The company has also replaced drinking water packaging using more suitable drinking water containers (gallons) and replaced used oil drums with tanks for water storage in the nursery

7.2.9

Based on interviews with management and observations at Bebunga Estate, Sungai Cengal Estate, and Bakau Estate, it is known that the company does not apply pesticides by air.

7.2.10

Special examinations are spirometry, cholinesterase, audiometry and physical examination for occupational diseases. For the 2023 MCU, the company shows the results of the MCU examination carried out at the Simpang clinic on August 4 2023 which was signed by the Simpang clinic doctor. The following participant data was obtained:

- BBF: 45 people
- BBE: 82 people
- SCE: 84 people
- BKE: 82 people

From the results of the special examinations, it was found that employees who had examination findings were required to undergo referrals, self-care and medication administration.

7.2.11

The company shows the 2023 KSP Region Regulation Fulfillment document which is signed by the Area Controller. This document contains regulations regarding employment and prohibitions on the use of underage workers.

Based on interviews with management and the gender committee, it is known that the company does not allow female workers who are pregnant or breastfeeding to carry out technical work at the Estate and will be transferred to light work in the office.

Based on field observations at Bebunga Estate, Sungai Cengal Estate, and Bakau Estate, it was seen that there were no workers who were pregnant or breastfeeding and no underage workers were found.

7.2.7

Status: Comply

7.3

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

7.3.1

The company has made improvements based on field findings as evidenced by several documents, including:

- Documentation of improvements to Fertilizer Sacks, in this document there is evidence of improvements and justification related to field observations. Also attached to the document is a Memo from the Estate Manager regarding the management of used fertilizer sacks and evidence of minutes of socialization to BMS Supervision to carry out instructions according to the Memo that has been issued.
- Documentation of repairs to Hazardous Waste, in this document there is evidence of repairs and justification in the form of minutes of socialization regarding the definition of Hazardous Waste, the potential dangers of used waste and socialization of Hazardous Waste storage areas. The company has also replaced drinking water packaging using more suitable drinking water containers (gallons) and replaced used oil drums with tanks for water storage in the nursery.
- Documentation of improvements - Hazardous Waste and Hazardous Waste warehouse, in these documents there is evidence of improvements and justification in the form of updating the manual logbook until August 2022 and submitting a medical waste logbook, as well as a recap of the calculation of incoming waste < 50 kg per day.
- Documentation of improvements - Logbook, this document contains the policy that currently all logbooks must go through verification by the Senior Assistant and be known to the manager as well as proof that the waste logbook has been updated in the hazardous waste warehouse.
- Hazardous Waste Logbook, which contains evidence that the Logbook has been updated with the latest data.
- Clinical waste logbook to BBF, which contains proof that the Logbook includes medical waste.
- 2022 Hazardous Waste Balance, which contains the latest waste data for 2022.
- Landfill follow-up, which shows that the Landfill has been repaired, and domestic waste scattered outside the Landfill area has been landfilled.
- Pondok 2 Domestic Waste, which shows evidence that comprehensive improvements have been made to the cottage 2 area by cleaning the area from domestic waste and traces of burning activities. Attached is also proof of the outreach activities which were submitted to the Contractor on August 25 2022.

In addition to proof of these improvements, the company has also provided supporting documents that can be proven, including:

- Updated SOP for Management of Ex-Fertilizer Sacks and Ex-Fertilizer Plastic.
- Updated SOP for hazardous and non-hazardous waste management.
- Evidence of socialization of hazardous and non-hazardous waste management in the Bebunga Factory area.
- Memo from the Estate Manager regarding the management of used fertilizer sacks.

Medical waste management

- The company owns a clinic that generates medical waste
- The company has an LB3 TPS Permit based on the Decree of the Head of DPMPSTP Kotabaru Regency No. 503/0272/PSLB3-P-DPMPSTP/2021 does not contain medical waste storage
- Based on Festronek dated 05-04-2023, the medical waste sent to party III was 0.118 tons. In 2022 there will be no medical waste deliveries.

Liquid waste management (POME)

- The company has PT Langgeng Muaramakmur Land Application Operational Feasibility Letter No. 660.3.4/1081/DLH-PPKL/XI/2022 covering an area of 571.9 Ha
- Agronomy Reference Manual (Policy No.: 110/EST-ARM/08) section 8.3 Fertilizing Palm Oil Plants, Application of Liquid Waste (POME). Application dose: Coastal soil: 360 liters/tree/year (2x applications), Inland soil: 550 liters/tree/year (2x applications), Irrigation System: 750 tonnes/ha/year (3-4x applications)
- The results of field observations, interviews and document verification, LA realization was only carried out in 3 blocks, namely Block D26, Block D27 and Block E27 covering an area of 43.98 Ha (7% of the permit). The flat bed conditions were muddy and shallow. No rotation
- The Company (BBE) has not been able to show the progress of the realization of Land Application Expansion Blocks F 16, F 17, F 18, F 19 (16 November 2021).

Liquid waste management is not in accordance with procedures (rotation) and management planning (realization of LA) which has the potential for environmental pollution

Domestic waste management

SOP for Management of Hazardous and Non-Hazardous Waste No. 11/SOP/2020 dated 1 August 2020,

- Separate organic and non-organic waste, collect each material in a collection box or drum
- If the material contains metal cans, the plastic can be sent to a designated sanitary landfill

N.C

Based on the waste management carried out by the company above, the company has not been able to show evidence of waste management in accordance with the plan and implemented in accordance with applicable laws and regulations.

7.3.2

The company has proof of delivery of LB3 to a Transporter licensed by PT. Balikpapan Environmental Service as follows:

- Cargo Waste Transfer CWT 009118 dated 04-05-2023 KT Truck 8986 K. Used Oil 7 drums, used B3 packaging 10 drums, used filter 3 drums, used Accu 4 drums
- Cargo Waste Transfer CWT 008935 dated 04-05-2023 Truck KT 8767 LN. Used B3 packaging, TL lamps, used filters, used Majun cloth.

The company has provided supporting documents that can be proven, including:

- Updated SOP for Management of Ex-Fertilizer Sacks and Ex-Fertilizer Plastic.
- Updated SOP for hazardous and non-hazardous waste management.
- Evidence of socialization of hazardous and non-hazardous waste management in the Bebunga Factory area.
- Memo from the Estate Manager regarding the management of used fertilizer sacks.
- Domestic waste management

7.3.3

The company does not carry out open burning to destroy waste, this can be proven from field observations in residential areas and the Bebunga Estate and Bakau Estate Landfills and no traces of burnt waste were found.

The company showed a report on the socialization of the ban on burning waste, for example at Bakau Estate, which was carried out on June 14 2023. Apart from that, during field visits, for example at Bebunga Estate, maintenance officers understood the fire prevention and control procedures set by the company.

7.3.1

Status: Non Conformity NCR No. 2023.01 with Minor Category

7.4

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

7.4.1

Procedures related to fertilization are indicated by the company in the Agronomy Reference Manual document Number 110/EST-ARM/13 which came into effect on 16 September 2013 and was approved by the Head of Plantation Upstream Indonesia, there is the following material in section 8 which discusses:

- Fertilizing immature plants
- Application of empty seeds on immature plants
- Fertilization of oil palm plantations produces
- EFB application on mature
- Palm Oil Mill Effluent (POME) Application
- Compost application
- Fertilizer sampling procedure for chemical analysis

7.4.2

The company shows plant maintenance records including:

- Reports on plans & realization of plant care in 2023 in the TM & TBM area are contained in the monthly estate performance document for each month.
- For example, soil analysis for Bebungan Estate was 46 samples and Bakau Estate was 39 samples with No. LS-FS-7.8-20/1dari1/01/01042020/Ka-Lab dated 09 April 2022, published by the Minamas Research Center. The parameters analyzed include C, N, pH(H₂O), pH(KCl), Ca, Mg, Na, K, Al, H, Fe, Pb, Ni, KB, and CEC.
- The results of leaf analysis for Bebunga Estate, Sungai Cengal Estate and Bakau Estate can be seen from the 2005-2022 Leaf Analysis Results (LSU) monitoring document. The parameters analyzed include Ash, N, P, K, Mg, Ca, and B.

7.4.3

In its nutrient recycling strategy, the company utilizes empty fruit bunches which are used as organic fertilizer. This is in accordance with the results of field observations, for example in the replanting of estate plantations in division 2 block b-27, it was seen in the field that empty bunches were used in replanting activities.

7.4.4

Reports on recommendations and realization of fertilization for the period 2022, for example at Bebunga Estate and Bakau Estate, include the following:

UNIT	Fertilizer	Recommendation		Realization	
		KG	AREA	KG	AREA
BBE	Rock Phosphate	808,114	3,032.41	744.950	3,032.41
	HGFB	42,979	3,032.41	26,225	3,032.41

	CPD NK	1,425,580	3,032.41	1,419,567	3,032.41
	CCM-45	324,757	3,032.41	325,885	3,032.41
	Kieserite	288,413	3,032.41	278,799	3,032.41
	MOP	114,885	3,032.41	114,912	3,032.41
UNIT	Fertilizer	Recommendation		Realization	
		KG	AREA	KG	AREA
BKE	Rock Phosphate	14,434	2,088	146,638	2,088
	HGFB	19,137	2,088	19,136	2,088
	NK	418,776	2,088	218,387	2,088
	CCM-45	277,766	2,088	149,198	2,088
	Kieserite	149,792	2,088	81,283	2,088

Based on the study of fertilizer realization data, it is known that there are fertilizers that have been realized according to recommendations and there are several fertilizers that have not been realized. Based on the results of field visits in block E7/8 Division II Bebunga Estate, it was found that there were workers carrying out manual sanitation maintenance with the initials S, T and N, who understood how to work according to applicable procedures. It is also known that the planting area and plants are well maintained and maintained.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

Based on the semi-detailed soil survey study document and land suitability for PT Langgeng Muaramakmur oil palm plantations for the 2016-2021 period, it was informed that the company's soil classifications include alfisol, entisol, inceptisol and ultisol and it is also informed a map of land slope types. Therefore, there is no peat soil classification at PT Langgeng Muaramakmur.

The topographic conditions at PT Langgeng Muara Makmur include the following:

SLOPE CLASS		DESCRIPTION	AREA (Ha)				
(%)	(°)		BBE	SCE	LNE	BKE	TOTAL
0-4	0-2	Level	118.19	2,078.59	564.62	30.20	2,791.60
4-12	2-6	Undulating	206.30	531.39	1,596.44	247.62	2,581.75
12-24	6-12	Rolling	1,016.43	418.59	-	2,962.84	4,397.86
24-38	12-20	Hilly	1,467.10	1,174.43	682.32	57.71	3,381.56
38-50	20-25	Somewhat Steep	677.14	98.84	-	-	775.98

Based on interviews with management representatives, document reviews and field observations, it was stated that the company does not yet have plans for the development of new plantations but do replanting. The company implements soil and water conservation by constructing terraces, central ditches, field drains and silt pits. Besides of that in accordance with the no-burn land management policy which was established on July 1 2022, signed by the Area Controller, it also explained that land clearing activities were carried out mechanically, replanting activities were carried out mechanically, and provision of water reservoirs at the location.

7.5.2

Based on the semi-detailed soil survey study document and land suitability for PT Langgeng Muaramakmur oil palm plantations for the 2016-2021 period, it was informed that the company's soil classifications include alfisol, entisol, inceptisol and ultisol. Therefore, there is no peat soil classification at PT Langgeng Muaramakmur.

The topographic conditions at PT Langgeng Muara Makmur include the following:

SLOPE CLASS		DESCRIPTION	AREA (Ha)				
(%)	(°)		BBE	SCE	LNE	BKE	TOTAL
0-4	0-2	Level	118.19	2,078.59	564.62	30.20	2,791.60
4-12	2-6	Undulating	206.30	531.39	1,596.44	247.62	2,581.75
12-24	6-12	Rolling	1,016.43	418.59	-	2,962.84	4,397.86
24-38	12-20	Hilly	1,467.10	1,174.43	682.32	57.71	3,381.56
38-50	20-25	Somewhat Steep	677.14	98.84	-	-	775.98

Based on interviews with management representatives, document reviews and field observations, it was stated that the company does not yet have plans for the development of new plantations but do replanting. The company implements soil and water conservation by constructing terraces, central ditches, field drains and silt pits. Besides of that in accordance with the no-burn land management policy which was established on July 1 2022, signed by the Area Controller, it also explained that land clearing activities were carried out mechanically, replanting activities were carried out mechanically, and provision of water reservoirs at the location.

7.5.3

Based on interviews with management representatives, document reviews and field observations, it was stated that the company does not yet have plans for the development of new plantations but do replanting. The company implements soil and water conservation by constructing terraces, central ditches, Field Drains and Silt Pits. Besides of that in accordance with the no-burn land management policy which was established on July 1 2022, signed by the Area Controller, it also explained that land clearing activities were carried out mechanically, replanting activities were carried out mechanically, and provision of water reservoirs at the location.

Status: Comply

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

7.6.1, 7.6.2, 7.6.3

Based on the semi-detailed soil survey study document and land suitability for PT Langgeng Muaramakmur oil palm plantations for the 2016-2021 period, it was informed that the company's soil classifications include alfisol, entisol, inceptisol and ultisol. Therefore, there is no peat soil classification at PT Langgeng Muaramakmur.

The topographic conditions at PT Langgeng Muara Makmur include the following:

SLOPE CLASS		DESCRIPTION	AREA (Ha)				
(%)	(°)		BBE	SCE	LNE	BKE	TOTAL
0-4	0-2	Level	118.19	2,078.59	564.62	30.20	2,791.60
4-12	2-6	Undulating	206.30	531.39	1,596.44	247.62	2,581.75
12-24	6-12	Rolling	1,016.43	418.59	-	2,962.84	4,397.86
24-38	12-20	Hilly	1,467.10	1,174.43	682.32	57.71	3,381.56
38-50	20-25	Somewhat Steep	677.14	98.84	-	-	775.98

Based on interviews with management representatives, document reviews and field observations, it was stated that the company does not yet have plans for the development of new plantations but do replanting. The company implements soil and water conservation by constructing terraces, central ditches, Field Drains and Silt Pits. Besides of that in accordance with the no-burn land management policy which was established on July 1 2022, signed by the Area Controller, it also explained that land clearing

activities were carried out mechanically, replanting activities were carried out mechanically, and provision of water reservoirs at the location.

Status: Comply

7.7

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

7.7.1 – 7.7.7

Based on a semi-detailed soil survey and land suitability study of PT Langgeng Muaramakmur for the 2016-2021 period, no peat soil classification was found.

Based on the description above, it can be concluded that the company does not have land with peat soil so this indicator cannot be applied (not applicable).

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has procedures related to identification, management and maintenance of water sources and quality which are listed in the SOP for Water Resources Management and Monitoring number SOP/SMART//BCOS-EHSD/SADV/II/004. The SOP explains several things related to the management of river borders and other water sources, such as for example in order to protect water resources, determining the width of river borders following Presidential Decree no. 32 of 1990, carried out border protection, carried out socialization to all parties involved in plantation operational activities to participate in carrying out water protection activities, making boundary markings, and monitoring water resources.

The company has a riverbank management plan which is described in the SOP for River/Waduk Management (DAS) and Conservation Area Management SOPs which were approved on June 1, 2019. Based on the results of document verification and field observations to several sampling locations, it shows that the company has carried out activities in an effort to improve water quality, including:

- Conduct socialization to all employees and the surrounding community to maintain water quality.
- Maintain the cleanliness of the environment around water sources so that sources of pollution can be minimized.
- Create a program to improve water quality gradually with the provisions of the applicable laws and regulations.
- Report the results of the examination in accordance with the provisions of the applicable laws and regulations.
- Testing the quality of river water and boreholes listed in the RKL/RPL report
- Management of erosion and surface water runoff, management of water in the lowlands and monitoring of surface water quality as stated in the implementation of RKL-RPL every semester.
- Waste water management using WWTP and Land Application.
- Monitoring the use of water for oil palm processing and evaluating its use.

The results of field observations in several locations of the Bebunga Estate and Bakau Estate River borders indicate that the company has a commitment to river border protection as evidenced by leaving the border area with a width of 50-100 meters to be left as forest and no replanting activities are carried out in areas that are not protected. have continued to plant oil palm.

7.8.2

The company has documents on water management, water source maintenance and water quality measurements.

Results of water quality analysis by GreenLab (KAN LP-1342-IDN) on 23 May 2023

- Drinking water is still appropriate according to the quality standards of Minister of Health Regulation No. 492 of 2010 for drinking water includes: RO Drinking Water Div-1 Bakau Estate, RO Drinking Water Div-2 Bakau Estate, RO Drinking Water Div-1 Bebunga Estate, RO Drinking Water Div-2 Bebunga Estate.

- Surface water still meets the quality standards of PP No. 22 of 2021 includes: Div-1 Bakau Estate Reservoir, Div-2 Bakau Estate Reservoir, Div-1 Bebunga Estate Reservoir, Div-2 Bebunga Estate Reservoir, Upper Bebunga River, Lower Bebunga River.

Wet streams in company areas are protected by the company. This is evidenced by the results of field observations in the Bebunga River area Blok C27 Sungai Cengal Estate, it is known that the riverbank is protected by the company. Some of the activities carried out by the company are installing signs as limits for chemical application and planting teak, etc. In addition, there are no traces of chemical application on the riverbank.

7.8.3

The company has

- WWTP
- Operational Feasibility Letter for Utilizing Liquid Waste for PT Langgeng Muaramakmur Land Application No. 660.3.4/1081/DLH-PPKL/XI/2022 Date 28 November 2022 from the Kotabaru Regency Environmental Service
- The company has a report on the results of the POME quality test carried out by a greenLab laboratory accredited by KAN (LP-1342-IDN) with reference to the Minister of Environment Decree Number 28 of 2003.

2023	Pond-1		Pond-10		Standard	
	pH	BOD	pH	BOD	pH	BOD
January	4.52	13,728	7.93	4,528	6-9	<5,000
February	4.18	13,651	7.53	4,329	6-9	<5,000
March	4.00	12,234	8.00	4,910	6-9	<5,000
April	6.80	13,350	7.10	4,145	6-9	<5,000
May	6.82	1,265	7.05	83.6	6-9	<5,000
June	6.83	1,180	7.05	102.6	6-9	<5,000
July	4.00	8,481	7.20	463		

Based on the analysis of test results for the period January – June 2023, it shows that all parameters still meet the applicable quality standards. This shows that the POME produced is still suitable for application to land.

7.8.4

- The company has a water use permit based on the Decree of the Head of the Provincial DPMPSTP. South Kalimantan No. 503/2.5-24/DPMPSTP/XI/2022 dated 29 November 2022 concerning Surface Water Utilization Permit (SIPA). Valid for PT LMR until 28 November 2025.
- Water usage data ranges from 6,000-9,000 m3/month. Water usage on 2022 was 84,151 m3

Status: Comply

7.9

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

The Certification Unit has made efforts to improve the efficiency of the use of fossil fuels and optimize renewable energy, these efforts are also monitored and documented in the form of a document Conversion of Biofuel to Solar in Bebunga POM.

The company has data on the use of waste for renewable energy as follows:

No	2022 & 2023		Proceed FFB (ton)	Solid Waste			
				Shell (Kg)		Fiber (Kg)	
				Production	Boiler	Production	Boiler
1	July	2022	11,143	591,756	591,756	1,340,727	1,340,727
2	August	2022	11,993	636,747	636,747	1,526,661	1,526,661
3	September	2022	12,021	647,504	647,504	1,424,735	1,424,735
4	October	2022	11,398	616,138	616,138	1,388,489	1,388,489
5	November	2022	11,288	646,153	646,153	1,430,300	1,430,300
6	December	2022	12,274	716,655	716,655	1,499,922	1,499,922
7	January	2023	10,543	583,028	583,028	1,306,901	1,306,901
8	February	2023	9,020	449,168	449,168	922,838	922,838
9	March	2023	10,028	528,025	528,025	1,038,689	1,038,689
10	April	2023	9,200	525,750	525,750	907,483	907,483
11	May	2023	14,317	840,920	840,920	1,516,220	1,516,220
12	June	2023	13,021	789,442	789,442	1,469,993	1,469,993

The results of interviews with the company stated that this efficiency is very useful because it can reduce diesel consumption. Currently it is only needed to turn on the generator as an initial electricity generator. This energy efficiency is also applied to all company operational activities by minimizing fuel use by contract workers, including all machine and transportation operations.

Status: Comply

7.10

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

7.10.1

The Certification Unit has carried out a GHG inventory contained in the Greenhouse Gas Emissions Mitigation Program document for the period 2022.

Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data has been entered into the RSPO GHG Calculator version 4.0. The summary of GHG emissions for the period January – December 2022 is as follows:

Summary Emission

Product	tCOe2 / tProduct
CPO	1.22
PK	1.22
PKO	0.00
PKE	0.00

Description	Unit	Value
Oil palm planted on mineral soil	Ha	10796.99
Oil palm planted area on peat	Ha	0.00
Total oil palm planted area	Ha	10796.99
Conservation area (Forested)	Ha	0.00
Conservation area (Non-Forested)	Ha	789.05
FFB Production per hectare	t/ha	13.27
OER	%	21.36
KER	%	4.24

Mill Emissions and Credits

Description	tCO2	tCO2e/t FFB
Emission Sources		
POME	3440.55	0.03
Fuel Consumption	240.05	0.00
Grid Electricity Utilisation	2.99	0.00
Credits		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
Total	3683.59	0.03

Estate/Plantation field emissions and sinks

	Own			Group			3rd Party			
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total
Emission Source										
Land Conversion	94705.58	9.08	0.75	7347.78	19.81	1.88	0.00	0.00	0.00	102053.36
CO2 Emissions from Fertiliser	5938.39	0.57	0.05	43.40	0.12	0.01	0.00	0.00	0.00	5981.79
N2O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O Emissions from Fertiliser	5396.96	0.52	0.04	51.67	0.14	0.01	0.00	0.00	0.00	5448.63
Fuel Consumption	3503.96	0.34	0.03	60.09	0.16	0.02	0.00	0.00	0.00	3564.05
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										
Crop Sequestration	-75678.36	-7.26	-0.60	-3473.11	-9.36	-0.89	0.00	0.00	0.00	-79151.47
Sequestration in Conservation Area	-1002.28	-0.10	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	-1002.28
Total	32864.24	3.15	0.26	4029.83	10.86	1.03	0.00	0.00	0.00	36894.07

The results of interviews with management stated that the increase in emissions was due to an error in inputting the planted area data in the previous year. The low emission value is also caused by the presence of a fairly large HCV area and low FFB processing activities because most of the company's area is in the replanting period.

7.10.2

The Certification Unit did not carry out new developments after 2014, but the company continues to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2022 for Mills and Plantations. This is done to estimate the carbon stock in the management area along with potential sources of emission that can occur directly as a result of the management, and a plan to minimize these emissions is drawn up and implemented.

7.10.3

The company has a report on the results of air emissions tests carried out by the 'greenLab' laboratory accredited by KAN (LP-1342-IDN) as follows:

Semester II 2022

- Emissions from Genset No.1 Cummins 500 KV Mill Bebunga 24 November 2022 still comply with Minister of Environment and Forestry Regulation No. P15/MENLHK/SETJEN KUM/1/4/2019
- Emissions from Genset No.2 Cummins 500 KV Mill Bebunga 24 November 2022 still comply with Minister of Environment and Forestry Regulation No. P15/MENLHK/SETJEN KUM/1/4/2019
- Maxitherm 40 Ton Mill Bebunga Boiler Emissions 24 November 2022 still comply with South Kalimantan Gubernatorial Regulation No. 070 of 2006

Semester I 2023

- Emissions from Genset No.1 Cummins 500 KV Mill Bebunga 17 May 2023 still comply with Minister of Environment and Forestry Regulation No. P15/MENLHK/SETJEN KUM/1/4/2019
- Emissions from Genset No.2 Cummins 500 KV Mill Bebunga 17 May 2023 still comply with Minister of Environment and Forestry Regulation No. P15/MENLHK/SETJEN KUM/1/4/2019
- Maxitherm 40 Ton Mill Bebunga Boiler Emissions 17 May 2023 still comply with South Kalimantan Gubernatorial Regulation

No. 070 of 2006

- Ambient air quality on 16-17 May 2023 refers to PP RI Number 22 of 2021
 - PKS Bebunga employee housing
 - Bebunga Mill Factory Area
 - In front of the Bebunga Mill Factory

Status: Comply

7.11

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

7.11.1

The Bebunga POM certification unit received the Zero Burning Policy as outlined in the Decree of the Head of Plantation Operations Number POD-UM-044/III/2010 dated March 9, 2010 regarding the 2010-2030 replanting program based on new blocks. The policy explains that land clearing is done by not burning but doing it mechanically.

The company also has an SOP on Fire Prevention and Handling Number 7302/PSQM-ESH/14 dated 7 August 2014. This procedure explains the Guidelines for Fire Prevention and Management, such as fire prevention measures (formation of a fire team, increasing team readiness and readiness by conducting firefighting training), fires with related agencies, checking equipment every month, identification, inventory of fire-prone locations, counseling to land clearing by implementing Zero Burning.), fire prevention, post-fire handling, reporting to agencies and internally, and determining the level of fire.

7.11.2

The company shows prevention implementation documents, which include documents 7300/PSQM-ESH/12 revision 01 concerning occupational safety and health procedures in points 21 and 22 regarding emergency response and fire prevention as well as reports on land fires for the period January – December 2022 with implementation results. In summary, there were no incidents of land fires in the PT Langgeng Muaramakmur area.

The company shows documents for maintaining fire control facilities and infrastructure, which include the document List of Facilities and Infrastructure for preventing and controlling forest and land fires until June 2023. This document briefly explains that all facilities and infrastructure at PT LMR starting from personal or individual equipment, team equipment, hand equipment, water pumps and accessories and data processing and communication facilities are in good condition and sufficient so that they are ready to be used if a fire emergency occurs.

The company shows a document reporting the implementation of fire prevention and control per year to the Kotabaru Regency Environmental Service, which is listed in the 2022 KSP Minamas Plantation Region Fire Report document, document handover date 21 January 2023 with number 01/KSP-LPKB/I/2023. In summary, the points listed in the report include whether or not there was a fire incident, prevention activities and so on.

7.11.3

The company shows evidence that it has human resources capable of preventing and controlling land fires, which includes showing that a fire management unit organization has been formed. Apart from that, the company has also provided training in collaboration with the Kotabaru Regency Social, Employment and Transmigration Service agency, on 03 - 04 August 2010, and can be shown a Fire Bridge Training and Certification certificate.

Status: Comply

7.12

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

identified and protected or enhanced.
7.12.1 and 7.12.8

The management unit has not carried out new land since November 15, 2018. The land clearing was carried out in 1993-2007. To ensure that land clearing for the period November 2005 to 2007 does not damage primary forest, the management unit has proposed a Disclosure of Liability and Land Cover Change Analysis (LUCA). The results of the LUCA study have been declared fulfilled by the RSPO on 20 May 2020 and have PASS status, with Final Conservation of Liability and remediation responsibility of 0 Ha. This indicates that the company did not clear primary forest after November 2005.

7.12.2

The company shows the 2022 HCV Assessment Management Review and Review document which states that the area of HCV that is included in the scope of certification is **1,092.62 Ha**.

However, because Lanting Estate is not included in the scope of certification, the actual area of HCV that should be owned by the company, especially those included in the scope of certification, should be less than **1,092.62 Ha**. The company shows the 2022 HCV Assessment Management Review and Review document which states that the area of HCV that is included in the scope of certification is **789.05 Ha**

Tabel 2.3. Rekapitulasi NKT/Potensi NKT di dalam kebun kelapa sawit PT. Langgeng Muaramakmur

NKT /Potensi NKT	Luas (Ha)	Persen (%)
NKT 1	87.66	0.54%
NKT 1 dan NKT 2	3.49	0.02%
NKT 1 dan NKT 3	6.75	0.04%
NKT 1, NKT 2, NKT 4 dan NKT 5	586.00	3.58%
NKT 1, NKT 2, NKT 3, NKT 4 dan NKT 5	39.02	0.24%
NKT 1, NKT 3, NKT 4 dan NKT 5	421.69	2.58%
NKT 1, NKT 4 dan NKT 5	105.14	0.64%
NKT 4 dan NKT 5	9.96	0.06%
NKT 6	0.30	0.002%
Total luas NKT/Potensi NKT*	1,260.01	7.70
Luas Areal PT. Langgeng Muaramakmur	16.990,75	

Review HCV 2022

Estate	Total HCV	Area
Lanting Estate	6	303.57
Bakau Estate	4	109.30
Sungai Cengal Estate	6	221.96
Bebunga Estate	5	457.79
Total		1,092.62

7.12.3

Indicator 7.12.3. currently irrelevant to Indonesia, until further decisions from the RSPO.

7.12.4

The company showed the revised HCV area identification document carried out by YASBI (2009) with the following results:

II.2. RINGKASAN TEMUAN NKT

Ekosistem kawasan UP PT. Langgeng Muaramakmur merupakan bagian dari ekosistem Teluk Pamukan dan DAS Cengal. Ekosistem ini terdiri dari ekosistem riparian, rawa air tawar, hutan tanah kering, kebun kelapa sawit, ladang dan kebun masyarakat. Ekosistem ini terdistribusi dalam empat kebun, yaitu Kebun Lanting, Bakau, Bebunga dan Sungai Cengal. Kondisi tutupan lahan di dalam dan sekitar UP PT. Langgeng Muaramakmur disajikan pada **Gambar Peta 2.7**.

Didasarkan hasil analisis lapangan diketahui bahwa di dalam kawasan UP dijumpai adanya nilai-nilai konservasi tinggi, baik aktual maupun Potensi. Kawasan bernilai konservasi tinggi tersebut disajikan pada **Tabel 2.3**.

Tabel 2.3. Rekapitulasi NKT/Potensi NKT di dalam kebun kelapa sawit PT. Langgeng Muaramakmur

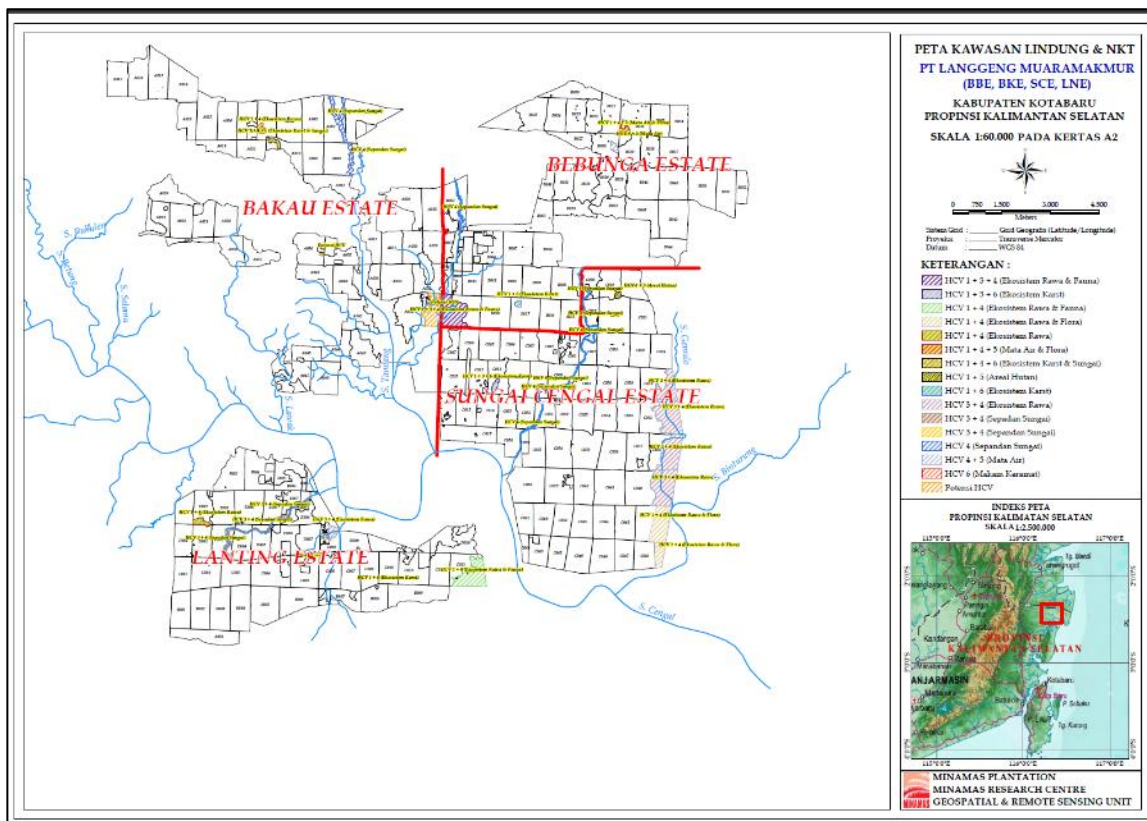
NKT /Potensi NKT	Luas (Ha)	Persen (%)
NKT 1	87.66	0.54%
NKT 1 dan NKT 2	3.49	0.02%
NKT 1 dan NKT 3	6.75	0.04%
NKT 1, NKT 2, NKT 4 dan NKT 5	586.00	3.58%
NKT 1, NKT 2, NKT 3, NKT 4 dan NKT 5	39.02	0.24%
NKT 1, NKT 3, NKT 4 dan NKT 5	421.69	2.58%
NKT 1, NKT 4 dan NKT 5	105.14	0.64%
NKT 4 dan NKT 5	9.96	0.06%
NKT 6	0.30	0.002%
Total luas NKT/Potensi NKT*	1,260.01	7.70
Luas Areal PT. Langgeng Muaramakmur	16.990,75	

The company shows the 2022 HCV Review document as follows :

Estate	Division	HCV	OBJECT	AREA	LOCATION
Lanting Estate	III	1+4	Fauna + Swamp	17.28	C12
	III	1+ 6	Gua Paya Burung	2.80	B08
	I	3+ 4	Swamp Ecosystem	98.72	D08.D09
	III	3+ 4	Boundary S. Rawa Selam	52.01	D003.D004.D005
	III	3+ 4	Boundary S. Lanting	38.59	D007. D011
	I	1+4	Swamp	94.17	E002
Total HCV	6			303.57	
Bakau Estate	I	1+4+6	Fauna + River	26.84	A010
	I	4	Boundary Anak S. Tamiang	61.68	A002
	I	4	Boundary S. Tamiang	17.21	A008
	I	1+4	Anak S. Tamiang Di tengah Blok B 41(42)	3.57	A005
Total HCV	4			109.30	
Sungai Cengal Estate	I	1+3+6	Sekumbang Cave (Karst Ecosystem)	7.51	C012
	II	1+5	Sumur Tujuh spring forested area	3.10	C019
	III	1+4	Swam[(Flora)	35.10	C043
	III; IV	3+4	Swamp Ecosystem	90.21	C028. C032. C036. C042
	II; III	6	Sacred grave	0.20	C009

	I	4	Boundary S. Bebunga	85.84	C056. C051. C027. C023
Total HCV	6			221.96	
Bebunga Estate	I	1+3+4	Swampy area (FAUNA) +25.97 Ha	390.53	B013 dan B019
	I	1+6	Cave	3.03	B017
	III	1+4+5	Water Springs and surroundings (FLORA)	1.26	B036
	III	4+5	Water Springs	1.26	B026
	I	4	Boundary S. Lintang	61.71	B002
Total HCV	5			457.79	

ESTATE	Total HCV	AREA
Lanting Estate	6	303.57
Bakau Estate	4	109.30
Sungai Cengal Estate	6	221.96
Bebunga Estate	5	457.79
Total		1,092.62



Lanting Estate is not included in the scope of RSPO certification so the HCV is reduced to an area of 789.05 Ha

7.12.5

The company has identified the needs of the community as well as the areas needed by the affected community to meet their basic needs, taking into account the potential for positive and negative changes in their livelihoods as a result of the company's operational activities. This can be proven by the existence of HCV 5 and 6 areas in the form of ancient caves, springs and forest enclaves with a total area of 31.7 hectares. The company has identified and carried out activities to minimize risks and impacts both for the community and for the environment, for example by providing regular socialization to the community not to apply chemicals in the canal area to avoid pollution, not to clear land by burning, and so on.

The unit of certification has also considered various land tenure and management options to protect the HCV area in a way that also protects the rights and livelihoods of local communities. Since the area managed by the company is entirely already planted area for oil palm which is not directly adjacent to the settlement, the level of potential conflict between the HCV area and the community is quite low.

The results of field observations in HCV 5 and 6 areas are in the form of springs and forest Enclaves where rights to culture and important places for the surrounding community have been identified in the company area. The company's environmental conditions both within the scope and in the community, area are almost entirely planted areas of plantation plants. Currently, the company also has an agreement with the community who are members of the Fire Alert Community, for example for monitoring and patrol activities, the company has also made an agreement with the community who are active in the company's area not to hunt and trade wildlife.

Regarding local culture, the company has tried to apply conservation principles by minimizing the hunting culture of the Dayak community, especially those in South Kalimantan. Hunting activities are daily activities of local people but can be mitigated by socialization and social approaches. Based on the results of interviews with the company, it is stated that currently the company is making efforts to protect animals by involving community leaders in HCV area management activities.

7.12.6

The Certification Unit already has a policy set out in procedures related to animal protection Number SOP/01/Satwa/I/2010 with the latest revision on January 2, 2021. The protection measures regulated by the company are as follows:

- Company employees and contractors are not allowed to capture, maintain or kill animals that are protected by state regulations.
- Company employees and contractors are not allowed to trade in wildlife, whether protected or not. If it is proven that there is involvement in the trading of the wildlife in question, severe sanctions will be imposed, including dismissal or cancellation of the contract.
- Employees and contractors are advised not to keep or hunt unprotected wildlife. The appeal will be implemented through educational and environmental awareness programs.
- The company strongly disapproves of the sale of wild animals within the entire plantation area, including mills and emplacements, and puts up signs (information boards at the emplacement, at the office, and on the side of the road that enters the company's area) to prevent wildlife trade from entering the area. within the company area, and asking employees and contractors not to buy wildlife from traders. Security officers are tasked with prohibiting wildlife traders from entering the plantation area.
- The company understands that employees and contractors can play an important role when buying wildlife to be sent to a rehabilitation center, or released again. However, the company is well aware that buying wildlife for this reason can further stimulate trade.
- All levels of superiors in every part of the company must pro-actively socialize this issue, set an example, and give a warning if any violation of this policy is found by their subordinates. If there is resistance, immediately report it to the Assistant, Senior Assistant and Manager for further action.

Information regarding the application of sanctions for employees in the form of disciplinary action in accordance with the provisions

of national law is also listed on the HCV signboard which explains that “anyone who violates will be reported to the authorities with the threat of criminal and fines”. The sanction is imposed by the company by giving the first warning letter to employees who violate work rules. Based on the results of interviews with company employees regarding animal protection, the company has committed to protecting animals that are within the scope of the company's management area, such as implementing a ban on hunting, killing and keeping wild animals within the company's environment. The procedure for animal protection also regulates the existence of sanctions or fines for those who violate these provisions.

7.12.7

Monitoring of HCV areas in the period of Semester 2 of 2022 is carried out regularly every month to ensure the security of the area. Monitoring activities are carried out in several river border locations and all areas of the company's management. This monitoring is carried out to see the progress of HCV management results from the initial stage to the current condition. The company also monitors the diversity of flora and fauna which is routinely carried out every year by the HCV team by showing the results of HCV monitoring conducted in 2021. The results of observing fauna in the plantation area are still found several types of protected animals that are included in the protection status according to IUCN, CITES and PermenLHK Number 106 of 2018 include the Root Tiger (*Prionailurus bengalensis*) and several types of Hornbills, Eagles, and Wild Boar (*Sus barbatus*). The results of interviews with employees also stated that there were still common types of Roots Tiger (*Prionailurus bengalensis*) and monitor lizard (*Varanus salvator*) around the plantation area.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or ✓
ASA-2.1	The unit of certification 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-2.1	The unit of certification does not use RSPO logo.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-2.1	The unit of certification does not use RSPO logo.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-2.1	The unit of certification does not use RSPO logo.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

- PT Budidaya Agro Lestari waiting for land title process to some of its operational area.
- PT Guthrie Pecconina Indonesia – Sungai Jernih Estate currently is in HGU process
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.
- There's extension scope of land use title on PT Bersama Sejahtera Sakti (previously uncertified unit) as amount as 240.12 ha.
- Based on social media verification related to uncertified unit, the issues are related to the issuance of land ownership which is still in process by the local agency.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit.</p>
2.1.2	No replacement after dates defined in NIS Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance 	<p>Company Group/Holding Statement: No replacement of primary forest or HCV or no new planting after Jan 1st 2010 for all uncertified units except for PT Sime Indo Agro, Bukit Ajong Mill East* Estate /Sei Mawang Estate which is currently under RaCP. LUCA submitted and currently under review process by appointed reviewer by RSPO.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
	HCVs in accordance with RSPO criterion 7.3.	<p>Auditor Verification: Sime Darby Plantation Berhad sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report of SDP Berhad is having been sent the 19 reports of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>Auditor Verification: Karya Palma Estate (PT Sandika Natapalma) and Beturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP it will be object of 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>Company Group/Holding Statement: The group has land conflict procedure in place. No Land conflict registered with RSPO Complaints System. No outstanding complaints with the RSPO.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement and there is no conflict in uncertified area.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is no labour dispute in company unit.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.: <ul style="list-style-type: none"> PT Sime Indo Agro 5,815 Ha PT Bina Sains Cemerlang 308.25 Ha </p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> PT Bahari Gembira Ria 1,639 Ha PT Guthrie Pecconina Indonesia 890 Ha

3.4. Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components

3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-1.4 & RC-2

NCR No.	:	2022.01	Issued by	:	Arief Tajalli
Date Issued	:	27 Augustus 2022	Time Limit	:	25 November 2022
NC Grade	:	Major	Date of Closing	:	13 October 2022
Standard Ref. & Requirement	:	3.4.1 Social and environmental impact assessments in new plantings or operations including mills, are carried out independently and participatively by involving affected stakeholders, including impact assessments of smallholder schemes/supplying gardens (if any). The assessment is documented.			
Evidence observed (filled by auditor): Based on the results of field observations, interviews, and document verification, the following information was obtained: <ol style="list-style-type: none">Based on the results of the 1995 AMDAL document verification, it shows that the entity in the document is still in the name of PT Indoagri Inti Plantation belonging to the Salim Group which was the former owner before being taken over by Sime Darby Group. Related to this, a discrepancy is obtained when referring to PPRI Number 22 of 2021, Appendix V regarding Types and Criteria for Changes in Business and/or Activities that may Cause Changes in Environmental Approval, in point 8 states "that changes in the identity of the person in charge of the business and/or activity enter into components that can lead to changes in environmental approvals".Based on the results of field observations to Sungai Cengal Estate, it shows that the company has an airport facility (Air Strip). However, the company has not been able to show the results of the environmental impact assessment document for the Air Strip facility. Related to this, evidence of non-compliance is obtained when referring to the Minister of Environment Regulation No. 05 of 2012, concerning Types of Business Plans and/or Activities Required to Have an Environmental Impact Analysis, in point F-5 it states "that the construction of airports for Fixed Wing and its facilities included in activities that are required to carry out an impact analysis on the environment".Based on the results of document verification, it shows that the entire area of PT LMR which is included in the South Kalimantan Administration has been included in the scope of the 1995 AMDAL study. Meanwhile, for the company's area that is included in the East Kalimantan Administration, it refers to the results of environmental studies in the form of the 2011 DPLH Document. , based on the results of the verification of the two documents, it shows that the area of Division 4, Bebunga Estate which is administratively part of the area included in the scope of East Kalimantan is not included in the two environmental studies. This is because the 2011 DPLH document refers to the area of the Application for Location Permits covering an area of 1,213 Ha which only includes 2 Divisions, namely divisions 2 and 3, Bebunga Estate which can be proven based on the picture below: HGU Map of Bebunga Estate (Division 1 – 3)					

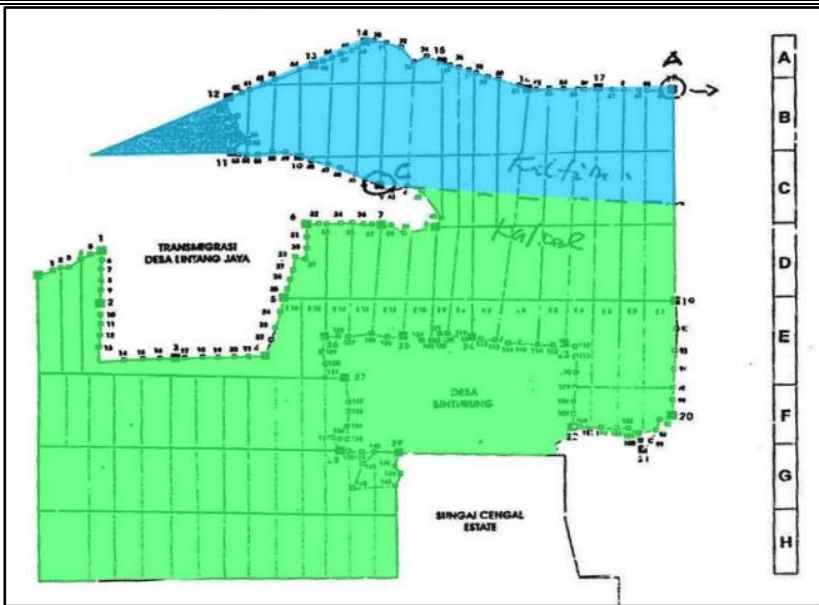
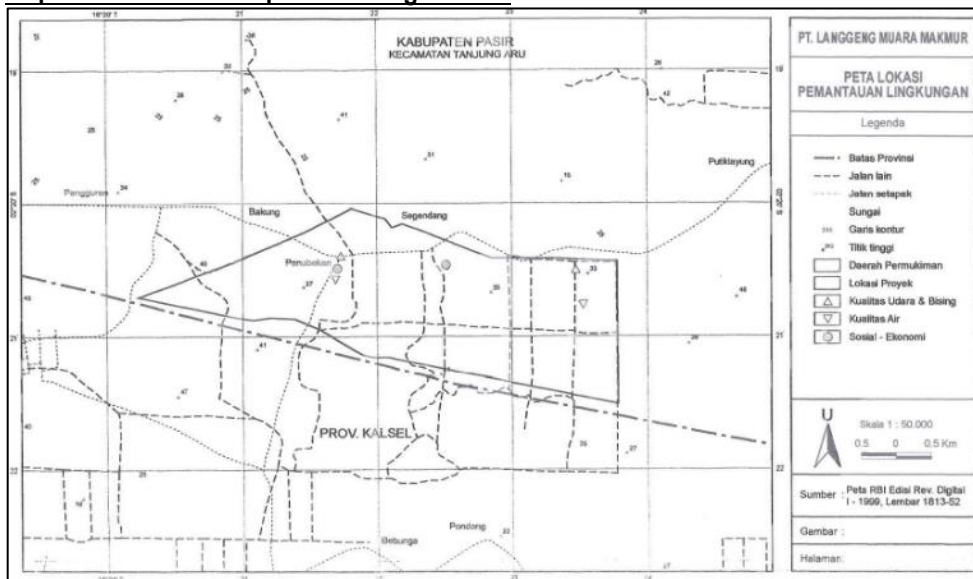


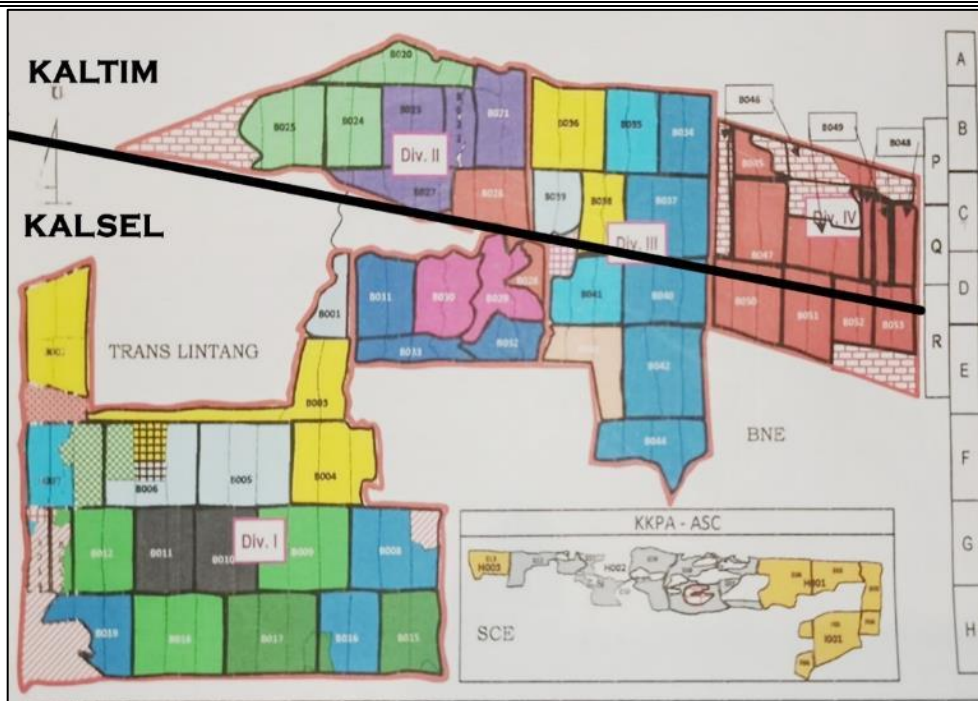
Image caption: Blue: HGU No. 04 of 1998 covering an area of 828,774 ha in East Kalimantan Province. The HGU refers to Location Permit no. 460.1/93/BPN-16.4/1999 covering an area of $\pm 1,000$ Ha, which was then submitted for changing the Location Permit to an area of 1,213 Ha in 2007 with Number 06/T.Praja-SILP/VII/2007.

Green: HGU No. 12 of 1997 covering an area of 15,533 ha in South Kalimantan Province. The HGU refers to the reserve permit in accordance with SK 07/PL.84/1989/BPN-43 for an area of 21,840 ha in Pamukan Utara District, South Kalimantan.

Map of DPLH 2011 Scope in Bebunga Estate



Map of Bebunga Estate (Division 1 – 4)



Based on the pictures above, it can be seen that the 2011 DPLH study did not cover the area of Division 4 Bebunga Estate which was included in the East Kalimantan Administration area. The results of the interview with the Kotabaru District Environmental Service also explained that the Office had provided a recommendation to renew the 1995 AMDAL document because the document was no longer relevant. The recommendation has been realized but has not been comprehensive because of the 4 companies included in the scope of the 1995 AMDAL document, only 2 companies have updated the AMDAL document.

Non-Conformance Description (filled by auditor):

The company has not been able to demonstrate that the scope of the 1995 AMDAL review is in accordance with the Company's Entity, and all locations and/or company operational activities have gone through the environmental impact assessment stage as stipulated in the applicable laws and regulations.

Root Cause Analysis (filled by organization audited):

1. The name of related PT in the AMDAL has not changed because there has not been a request for a name change in the PT LMR in AMDAL document.
2. Air strip environmental studies have not been carried out because PT LMR has not yet found a consultant to arrange for environmental studies to be carried out by the authorized agency.
3. The PT LMR area which was included in East Kalimantan did not yet have an environmental study because at the time of its implementation, the BPN had not yet completed the HGU management so that it became a deduction from the East Kalimantan environmental study area (DPLK).

Correction (filled by organization audited):

RSQM Coordinates with the PSD Department to make a request for an addendum AMDAL to the environmental service which includes (1) changing the name of PT Indoagri Inti Plantation to Minamas Plantation, (2) covering the total area of PT LMR and existing activities at PT LMR and (3) covering a study environment for water strip at PT LMR. The action has been initiated with evidence:

- Plan for completion of environmental studies for water strips, environmental studies of BBE division 4 and AMDAL Addendum.
- Letter of assignment for PSD to DLH Kotabaru as initial coordination for the completion of the AMDAL Addendum
- Attached document.

Corrective Action (filled by organization audited):

The work plan for the coordination meeting between the RSQM Team and the PSD Team regarding legal and environmental

aspects at PT LMR.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification (13 October 2022):

Companies can show proof of improvement consisting of several documents, including:

- Letter of submission for Addendum to ANDAL Number 371/LMR/UM/IX/2022 addressed to the District Head of Kotabaru Regency on September 22, 2022 explaining that there is a change in the company's condition and the current laws and regulations, the company intends to carry out an AMDAL addendum for PT Langgeng Muaramakmur (LMR) considering that there are still many studies or aspects that have not yet been included in the existing AMDAL studies. The aspects that will be included in the new AMDAL study are as follows:
 - Replanting Aspect.
 - Aspects of Airport/Airstrip Development.
 - Aspects of Utilization of Wastewater to Ground, Domestic Waste, Hazardous Waste
 - Traffic Aspect related to air pollution.
 - Forest and Land Fire Prevention Aspect
- Receipt of the document for submitting the ANDAL addendum mentioned above which was stamped and signed by the Kotabaru Regency Environmental Service on September 27, 2022.
- Letter of assignment for personal appointment who will submit the ANDAL addendum mentioned above Number 12/PSD_KSP/IX/2022 dated September 3, 2022 which has been stamped and signed by the DPMPSTP and the Kotabaru Regency Environmental Service.

Based on the documents mentioned above, it can be concluded that the company has had the initiative to correct non-compliance by updating environmental assessment documents. Related to this, **the non-conformity has been fulfilled by observation.** Observations were made to ascertain the progress of completing the AMDAL addendum and to what extent.

Follow up on next audit (filled by auditor):

Follow up during the next audit assessment (completed by the auditor):

The company has the ANDAL Addendum and RKL-RPL Type C documents for Palm Oil Plantation and Processing Activities with Capacity of 60 FFB/Hour and other supporting facilities with a land area of $\pm 10,812.29$ Ha located in Bakau Village, Betung Village, Pamukan Village Indah, Balamea Village, Mulyo Harjo Village, Kalian Village, Tamiang Village, Harapan Baru Village, Lintang Jaya Village, Binturung Village and Manunggal Lama Village, Kec. Pamukan Utara and Kec. Durian River District. Kotabaru Prov. South Kalimantan By PT. Lasting Muara Makmur. Available Decree of the Head of the Kotabaru Regency Environmental Service No. 660/59/Tatling-DLH/2023, dated 12 January 2023 concerning the Environmental Feasibility of Addendum ANDAL and RKL-RPL Type C.

However, the AMDAL Addendum document (2023) does not yet cover all operational areas based on the following documents:

- The company has HGU covering an area of 16,990.75 Ha (South Kalimantan Province covering an area of 15,533 Ha and East Kalimantan Province covering an area of 828.7741 Ha and 628.98 Ha)
- The company has made changes to environmental documents (AMDAL, 1995) including:
 - Environmental Management Document (DPLH, 2011) for Palm Oil Plantation Activities Covering an Area of 1,213 Ha. in Prov. East Kalimantan
 - UKL-UPL Document (2013) Construction and Operation of Special Terminals and Supporting Facilities (CPO Pier 10.11 meters long and Kernel Pier 16.44 meters long) Prov. South Kalimantan
 - ANDAL and RKL-RPL Addendum Document Type C (2023) Palm Oil Plantation and Processing Activities With a Bebunga Factory Capacity of 60 FFB/Hour and other supporting facilities with a land area of $\pm 10,812.29$ Ha located in Bakau Village, Betung Village, Desa Pamukan Indah, Balamea Village, Mulyo Harjo Village, Kalian Village, Tamiang Village, Harapan Baru Village, Lintang Jaya Village, Binturung Village and Manunggal Lama Village, Kec. Pamukan Utara and Kec. Durian River District. Kotabaru Prov. South Kalimantan.
- The company shows a letter from the Head of the District Environmental Service. Kotabaru No. 660/1019/Tatling-DLH/2023 dated 23 August 2023 Regarding Document Revision Process. Contains improvements to the AMDAL Addendum document which does not yet cover plantation afdeling.
- The company shows a letter from the Head of the District Environmental Agency. Kotabaru No. 660/226/DPLH/2023 dated 25

August 2023 Regarding the Document Revision Process. Load the DPLH Addendum request.

So it becomes an opportunity for improvement.

Companies must continue to improve environmental documents in accordance with the scope of operational areas and the scope of all operational activities

Verified by : **Arief Tajalli/ I Wayan Sudi Antara**

NCR No.	: 2022.02	Issued by	: Haikal Ramadhan K
Date Issued	: 27 August 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	: 14 October 2022
Standard Ref. & Requirement	6.7.2 Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		

Evidence observed (filled by auditor):

Fire Prevention and Fighting

The results of the field visit found a number of conditions, for example at Bakau Estate where there is an APAR with a red pressure indicator at a residential location (Divisions 1&3) and at a petrol storage area.

First Aid Facilities

- The results of the field visit found the following conditions:
 - Bebunga Mill : There are first aid kits in the process and workshop rooms, but hansaplast and triangular/mitella cloth are not yet available, There is a first aid kit at the temporary storage of hazardous and toxic waste location but the contents are incomplete.
 - Bakau Estate : There are first aid kits in the chemical warehouse, but the last monitoring will be in 2021 and aquades, povidone iodine and triangular/mitella cloth are not yet available; The fertilizer foreman brought 2 first aid bags containing 11 items each, but there was no monitoring of the contents of the first aid kit and there were betadine and rivanol which had expired since 2020.
 - Sungai Cengal Estate : first aid bags were found at all visits containing betadine which had expired in May 2022 and there was no aquades and monitoring of first aid kits.
- The first aid procedure for accidents and first aid kits with Number P3K-01 which states that in the mechanism for checking the box and contents of the first aid kit, in point 1, first aid checks are carried out every month and the list of drugs/materials in the first aid box is 21 items for offices and 12 items for field activities.

During the audit activities the company has shown several corrections such as completing the fire extinguisher in the Bakau housing estate and updating the contents of the first aid box at the temporary storage of hazardous and toxic waste Bebunga Mill but the company has not analyzed the root cause of the problem and preventive measures that can ensure that the things encountered during the field visit do not happen again in the area. later.

Non-Conformance Description (filled by auditor):

The company has not been able to show sufficient evidence that its emergency response facilities and infrastructure, including first aid facilities, can be used immediately if needed.

Root Cause Analysis (filled by organization audited):

- Light fire extinguisher is empty because it's time to be replaced. An empty fire extinguisher because based on usage it has

been used for more than 4 years and not yet 5 years, so the usage has not reached the maximum limit, but at the beginning of the month checking the light fire extinguisher is still feasible to mark with the pressure gauge still on the green indicator, the light fire extinguisher acceptance document for the warehouse at BSE

- The first aid kit is incomplete because the contents of the first aid kit have not been updated because local purchases are being made.
- The contents of the first aid kit are expired because the Supervision does not understand how to check the contents of the First Aid Kit where if there is expired medicine or if it runs out, it is immediately refilled which is coordinated directly by the SCE Safety Officer.

Correction (filled by organization audited):

- Evidence that the fire extinguisher has been replaced.
- Complete the contents of the first aid kit and replace the contents of the expired first aid kit.
- Carry out supervision socialization to be consistent in keeping the contents of the first aid kit always fulfilled.
- Conduct outreach regarding PT LMR Light fire extinguisher SOP.

Corrective Action (filled by organization audited):

- Monitor the fire extinguisher and check the list of firefighters periodically every month by the safety officer.
- Monitoring the contents of the box and the expiration date of the contents of the first aid kit by the safety officer at the beginning of each month.
- The first aid kit usage book is updated every time it is used. Attached document.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on September 13, 2022

The company shows evidence of improvement in the form of:

- Minutes of the replacement of Light fire extinguisher at residential locations and in gasoline storage warehouses.
- Monitoring Light fire extinguisher and first aid kit

However, there is a need for further studies and supporting evidence, including:

- Root cause point 1 not accepted
- Please indicate the type and amount added to the first aid kit at the Bebunga Mill and Bakau Estate locations
- Please show the socialization to the supervisor to be consistent in keeping the contents of the first aid kit at the Bebunga Mill and Bakau Estate locations

So, this non-conformity is declared not fulfilled.

Verification date 25 September 2022

The company shows evidence of improvement in the form of:

- Minutes of filling out the contents of the first aid kit in the BBF and BKE units.
- First aid training for the PT LMR unit which was attended by 33 participants.

However, there is a need for an explanation regarding the root of the problem in point 1 and there is no evidence about PIC where (for example: in gas storage and housing) now about this mechanism for charging the fire extinguisher outside the routine monitoring schedule.

So this non-conformity is declared not fulfilled.

Verify October 14, 2022

The company shows evidence of improvement in the form of :

- SOP for Checking Light fire extinguisher No 65/LMR-PA/2012 which explains the mechanism for checking Light fire extinguisher and the personnel in charge of monitoring the condition of Light fire extinguisher.
- Socialization of OHS and emergency response facilities (Light fire extinguisher) which was held on August 20, 2022, which was attended by 30 participants in the BKE field.

Based on the corrective action and preventive action documents submitted, the non-conformance in this indicator is declared to be

fulfilled.

Follow up on next audit (filled by auditor):

Follow up during the next audit assessment (completed by the auditor):

Auditor Verification dated September 16, 2023

The assessment was carried out by looking at the field conditions at the factory in the boiler and press area as well as in the petrol storage warehouse. The fire extinguisher was seen when the pressure indicator was in the green indicator and the officers in the area understood how to use the tool.

Monitoring of first aid kits is also carried out by looking at evidence of monitoring carried out every month. For example, in the Bebunga plantation, when we checked the foreman's bag, we found first aid tools and materials in sufficient condition and complete.

Socialization is also carried out by the company to employees, for example on 23 January 2023 at BBE, OHS socialization which was attended by 46 employees, 02 February 2023 at BBF regarding OHS socialization and fire handling for 53 employees, and on 25 May 2023 OHS socialization at SCE for 20 employee.

Verified by : **Kiki Fadli/Haikal Ramadhan K/ Muhammad Yusuf Safardan/ Septian Maulana**

NCR No.	: 2022.03	Issued by	: Haikal Ramadhan K
Date Issued	: 27 August 2022	Time Limit	: 24 November 2022
NC Grade	: Major	Date of Closing	: 13 September 2022
Standard Ref. & Requirement	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Evidence observed (filled by auditor):			
PPE			
<ul style="list-style-type: none">The results of the field visit found the following conditions:<ul style="list-style-type: none">Bebunga Mill : There is 1 employee doing welding work in the workshop area, but workers do not use welding face shields and There are 3 boiler employees doing fire up work, but workers do not use glasses and earplugs.Bakau Estate : There are 7 spray employees who do not use glasses as provided by the company, but bring glasses that were purchased personally as eye protection and There are 15 fertilizer employees who do not use glasses as provided by the company.Sungai Cengal Estate : The harvest foreman does not use the shoes provided by the company and the shoes are perforated.Based on the PPE Sign Board, which includes PPE for the spray team and fertilizer team, namely glasses, shoes, gloves, aprons and masks.Procedure for personal protective equipment Number 739/TQEM-ESH/10 which states, among others:<ul style="list-style-type: none">Point 5.1, namely that everyone in the field is responsible for wearing the appropriate PPE.Point 5.3, namely the assistant/Senior Assistant/Manager is responsible for ensuring that workers have and use the PPE needed and in good condition.Minister of Manpower Regulation No. 8 of 2010 concerning PPE in article 2 states that:<ul style="list-style-type: none">In paragraph 1, employers are required to provide PPE for workers/laborers in the workplace.In paragraph 3, namely PPE as referred to in paragraph (1) must be provided by employers free of charge.			

- The company shows corrective documentation for field visits related to PPE for Bakau Estate, Sungai Cengal Estate and Bebunga Mill, but the company has not analyzed the root causes and preventive actions so that things encountered during field visits do not happen again in the future.

Pesticide Applicator Sanitation Facilities

- Based on a field visit to BSS Sungai Cengal Estate, the following conditions were found:
 - There are 35 lockers for officers, but the lockers are empty/not in use and several lockers are damaged.
 - Bathrooms and PPE/Work Equipment washing tubs are dry and have not been used for a long time. Whereas on the day of the field visit there were spraying activities at two different locations with a total of 26 members
- Based on interviews with spray workers at Sungai Cengal Estate and Bakau Estate, it was stated that work clothes were brought personally from home and after work, the work clothes would be washed at each worker's home.
- HIRAC Estate for the 2022 period which identifies the risk of spraying work which includes point 7, namely the workers return to the BSS and ensure that the work equipment is properly arranged, does not spill, the contents of the mixture & pump have been applied and the entire Team is in clean condition.
- Minamas Sustainability & Quality Management System (MSQMS) document Chapter 25.B concerning Block Spraying System (BSS), explains, among others, the following:
 - In point 5.20, that is, after work all employees of the BSS team must bathe first at the BSS house provided by the operational unit.
 - All PPE and clothes for the BSS team are washed at the BSS house by the officers and are not allowed to take them home.
- From the results of the field visit, it was also known that there were pesticides stored in the BSS house such as achepate and glyphosate in an open container.

Non-Conformance Description (filled by auditor):

- The company has not been able to show sufficient evidence that workers have used the PPE provided in an orderly and consistent manner in accordance with the procedures and the results of the risk analysis that have been determined
- The company has not been able to show sufficient evidence that the sanitation facilities for pesticide applicators have been used properly

Root Cause Analysis (filled by organization audited):

BBF - Employees are not disciplined in using PPE

SCE - In the previous 3 days the Harvest Foreman in question had used the shoes provided by the company, due to the rainy weather factor the shoes were wet and smelly so the foreman did not immediately wash and dry them after wearing the shoes but used other shoes.

BSS SCE House :

- The lockers are still in use by the spray team, but there are several locker booths that are in a damaged/rotten condition.
- The water pump is damaged so there is no water reservoir in the tub.
- Lack of understanding due to new spray workers

Hazardous and toxic waste at BSS HOUSE :

- There are remaining materials that have been billed from the warehouse but have not been used up.
- Rain conditions that cause the material not to be fully used.

Correction (filled by organization audited):

BBF – Provide warning letters to employees who violate the rules of not using PPE while working.

Then the employee makes a statement from the employee not to repeat it again. Provide evidence of employee documentation using PPE at work. Attached documentation.

SCE – Gives a letter of warning to the harvest foreman who makes excuses for not using and maintaining PPE properly. Show proof of handover of shoes in May 2022 which have been given to all employees. Attached documentation.

BSS SCE House

Show evidence of the following follow-up:

- BSS home documentation used by spray employees
- Memo that all SCE spray employees are required to use the BSS house and its socialization
- Re-training for new BSS employees "
- Providing SOP socialization at BSS's house to spray employees.
- Show the documentation of the BSS house used by the spray team.
- Check the list of BSS home equipment.
- Attached documentation.

Waste Hazardous And Toxic Materials In The Rinse House

Show evidence of the following follow-up:

Returning pesticides in the chemical warehouse when they are not used up in the field (Documents for returning materials to the warehouse)

Corrective Action (filled by organization audited):

BBF – Take the following precautions:

- Safety briefing and PPE check list before work by an assistant
- Inspection on PPE safety monitoring by Safety Officers and staff

SCE – Take the following precautions:

- The assistant/foreman carries out a daily PPE checklist before work to ensure the condition of the PPE used is in good or damaged condition, for example shoes.
- Deliver socialization to employees in the form of safety briefings regarding always using the PPE provided by the company.

Rinse house SCE

Take the following precautions:

- More training for the spray foreman to understand his duties and responsibilities as a foreman.
- The assistant in charge of the rinse house periodically checks the BSS facilities.
- Make monitoring/attendance for all spray employees entering/leaving the rinse house.
- Dissemination of Complaint SOP to the BSS Foreman and employees to always pay attention to the existing infrastructure at the rinse house.

Hazardous and toxic waste at Rinse House

Take the following precautions:

- Make a bill of materials requisition enough for one day's work.
- Make an internal manager memo regarding controlling the use of pesticides and socialize it.
- Conduct socialization of Rinse house SOPs so that they can be implemented properly.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on September 13, 2022

The company shows evidence of improvement in the form of:

- A warning letter for employees who do not use PPE and a statement not to repeat the act.
- Documentation of the use of PPE by employees at Bebunga Mill, Bakau Estate and Sungai Cengal Estate.
- Proof of checking PPE for example on Bebunga Mill which was carried out on August 29, 2022 at maintenance locations, processes, laboratories, etc.
- Internal office mail regarding the reaffirmation of the use of the Rinse House SCE with No. 026/Intern/VIII/2022 addressed to all assistants.
- Minutes of BSS home improvement at SCE such as filling water in tubs, repairing lockers and repairing chemical water traps.
- Socialization of BSS SOP to employees and spray foreman.

Based on the corrective action and preventive action documents submitted, discrepancies in this indicator are declared fulfilled by observation in the next assessment.

Follow up on next audit (filled by auditor):

Follow up during the next audit assessment (completed by the auditor):

Verification date September 16, 2023

During field observations, for example in Bebunga Estate and Mill, all employees use complete PPE in accordance with available procedures. Employees also said that every muster morning they also conveyed the importance of having complete PPE and working according to procedures

At BSS house the Bebunga Estate was also seen to be in good condition and clean. Employees also understand the procedures for washing spray equipment and PPE in the spray house.

Verified by : Kiki Fadli/Haikal Ramadhan K/ Muhammad Yusuf Safardan/ Septian Maulana

NCR No.	: 2022.04	Issued by	: Haikal Ramadhan K
Date Issued	: 27 Agustus 2022	Time Limit	: 24 November 2022
NC Grade	: Major	Date of Closing	: 13 September 2022
Standard Ref. & Requirement	7.2.7 Storage of all pesticides in accordance with recognized best practices		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">Based on the field visit at BSS house, Sungai Cengal Estate, it is known that there are pesticide storages such as metaprima, kenrane, prima up, achepate, and explore. Pesticides are placed on the floor and without material information, without the hazardous and toxic waste symbol and without palletsThe pesticide packaging storage procedure Number 01/KSP-Pestisida/10/2020 which explains as follows:<ul style="list-style-type: none">In point 5.2, pesticides must be stored in a safe place (locked warehouse), separate from fertilizers, foodstuffs, and water sources.In point 5.3, each type of pesticide must be placed separately according to its respective group, namely herbicides, fungicides, rodenticides and insecticides.Government Regulation No. 74 of 2001 concerning the management of hazardous and toxic materials which states that:<ul style="list-style-type: none">Article 14 states that every hazardous and toxic waste produced, transported, circulated and stored must be packaged according to its classification.In article 15 point 1, each hazardous and toxic waste packaging must be given a symbol and label and is equipped with a Material Safety Data Sheet.			
Non-Conformance Description (filled by auditor):			
The company has not been able to show that all pesticides have been stored according to the established procedures			
Root Cause Analysis (filled by organization audited):			
Pesticides are stored in the BSS house because the spray foreman does not understand how to store the remaining unused materials.			
Correction (filled by organization audited):			
Conduct socialization to foremen and spray employees about handling chemicals according to SOP.			
Corrective Action (filled by organization audited):			
Make a receipt of sufficient material requisition for one day's work. Make an internal manager memo regarding controlling the use of pesticides and socialize it. Socializing the BSS house SOP so that it can be run properly.			

Assessor Evaluation and Conclusion (filled by auditor):
Date Verification 13 September 2022

The company shows evidence of improvement in the form of:

1. Internal office mail regarding confirmation of hazardous and toxic waste to the BSS SCE team with No. 026/Intern/VII/2022 which states that it is not allowed to bring ex-pesticide packaging to the house and requires employees and spray foreman to use complete PPE.
2. Socialization of hazardous and toxic waste to spray employees followed by pesticide applicators and foremen.
3. Minutes of return/placement of pesticides from BSS house to pesticide storage warehouse.

Based on the corrective action and preventive action documents submitted, the non-conformance in this indicator is **declared to be fulfilled**.

Follow up on next audit (filled by auditor):
Follow up during the next audit assessment (completed by the auditor):
Auditor Verification dated September 16, 2023

During field observations, the pesticide storage warehouse was in clean condition and the pesticides were neatly arranged in the space provided and equipped with MSDS for each type of pesticide. Apart from that, the company also records pesticide use, such as the type of pesticide used and the amount used each month.

Verified by : **Kiki Fadli/Haikal Ramadhan K/ Muhammad Yusuf Safardan/ Septian Maulana**

NCR No.	:	2022.05	Issued by	:	Arief Tajalli
Date Issued	:	27 Augustus 2022	Time Limit	:	Next Assessment
NC Grade	:	Minor	Date of Closing	:	15 September 2022
Standard Ref. & Requirement	:	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.			

Evidence observed (filled by auditor):

Based on the results of document verification and field visits in several locations, the following information was obtained:

Hazardous Waste Management

- Observations at the Bebunga POM Hazardous Waste Temporary Storage Warehouse are seen in full condition, the Logbook for recording data in and out of waste contained in the warehouse was also last updated in 2019.
- The company can show Logbook documents for the period January – August 2022 in the form of digital recapitulation, as well as manual logbooks for the period August 2022. However, in the document there is information that is out of sync, for example for waste used oil in the digital logbook, the last stock is written as much as 1,656 Kg, while for the manual Logbook written 4,480.5 Kg. In addition, the data for entering and leaving medical waste has not been shown.
- The results of the verification of digital logbook data for used chemical packaging show that waste data enters only in January, March and August 2022. When referring to the date of the last transportation based on the Manifest document, it shows that the last transportation was carried out on March 31, 2022. Based on this, there is an indication that hazardous waste is stored not in a licensed warehouse, with a period of more than 90 days.
- Based on the verification of the document "Monitoring Pesticide Usage 2022" showing a fairly large amount of pesticide use, field observations also show that the company is carrying out replanting activities that are evenly distributed throughout the Estate, thereby increasing the use of pesticides. However, the results of the verification of the source data for used chemical packaging waste in the Logbook only came from Bebunga Estate, while there were none for Bakau Estate and Sungai Cengal Estate. Related to this, the results of field observations in the Division 3 Warehouse area, Sungai Cengal Estate showed that many used chemical packaging were stored not where they should be. Based on this, there is an indication that not all chemical

packaging waste has been stored in licensed Hazardous waste storage.

- It was found that hazardous waste was reused, such as used oil stored in drinking water containers (without labels), as well as oil drums and pesticide jerry cans used for water storage.
- Based on the results of field observations in all sample locations, it was found that there were quite a number of former fertilizer sacks scattered in ditches and roads.

Domestic Waste Management

- There is a lot of domestic waste/waste in the housing area of employees and contractors (Sungai Cengal Estate) Pondok 2, and from the sample locations it was also found that there were domestic waste burning activities.
- The results of interviews with management and field observations obtained information that the form of domestic waste management carried out by the company was open dumping or open dumping of waste (without holes), however, the company could not explain the process of destroying the waste.

Related to the above, the company has made several direct improvements such as collecting hazardous waste at Hazardous waste storage, equipping satellite Hazardous waste storage with alarms, and so on. However, the company has not been able to pinpoint the root of the problem and corrective actions related to it. In addition, hazardous waste management has also become a non-conformance in the ASA 1.2 assessment and has been declared Close in ASA 1.3. However, during the onsite audit of ASA 1.4 + RC the same non-conformity was found.

Based on the information above, several evidences of non-compliance were obtained when referring to the applicable procedures and laws, including:

- SOP Number 01/KSP-Pestisida/10/2020 concerning Storage of Used Pesticide Packaging Waste
- SOP Number 040/LMR-PL3/C9 concerning Hazardous and non-hazardous Waste Management
- Decree of the Head of Bapedal Number 3 of 1995 concerning Technical Requirements for Hazardous waste Management
- PP RI Number 101 of 2014 concerning Management of Hazardous and Toxic Waste
- PP RI Number 74 of 2001 concerning Management of Hazardous and Toxic Materials
- PP RI Number 81 of 2012 concerning Management of Household Waste and Similar Waste
- PermenLHK Number 12 of 2020 concerning Storage of Hazardous and Toxic Waste

Non-Conformance Description (filled by auditor):

Based on the evidence obtained, this is a non-conformity because the company has not been able to implement waste management as regulated in company procedures and applicable laws and regulations, as well as consistency in waste management.

Root Cause Analysis (filled by organization audited):

Hazardous waste Management.

- Hazardous waste shipments in the form of used pesticide packages from the Estate in 2022 increased.
- Update logbooks in the form of books that have been made in 2021 – 2022 are brought to the office to be updated, so the 2019 logbooks are still left in the warehouse.
- Has not been given a manual logbook that has been updated. Waste comes out to the auditor
- Have not submitted the medical waste logbook to the auditor.
- Workers does not understand that there is no storage that exceeds >90 days at the Hazardous waste Satellite storage in the estate unit so that waste is stored for a long time (>90 days) in the Hazardous waste Satellite Warehouse.
- The Hazardous waste logbook update has not been sent to the auditor.
- There is still a lack of understanding of employees regarding the risk of potential hazards from the use of ex-Hazardous waste as a place for drinking water consumption and other water storage areas.
- Supervision control is still weak in terms of the management of ex-fertilizer sacks where many are still found scattered on Collection Road and Main Road.
- Monitoring in and out of ex-fertilizer sacks has not been carried out consistently.

Domestic waste management
SCE

- The area that contains a lot of domestic waste is the former house of an employee who has moved to Pondok 1
- Many of the employees of cottage 2 have moved to cottage 1, and in September they will all be transferred to Pondok 1. So that the perception or perception of employees arises not to take care of cottage 2 anymore.
- Lack of understanding of replanting contractor employees regarding the prohibition of burning waste in the company's environment.

BKE

- The trash can have not been put into the garbage pit because the schedule for making the trash can is not yet full, but the trash is full.

Correction (filled by organization audited):
Hazardous Waste Management.

Take the following corrective actions:

- Update Logbook until August 2022.
- Manual Hazardous Waste Logbook Update
- Submitting a Medical Waste Logbook
- Submitting a recapitulation of Hazardous Waste storage in the Hazardous Waste Satellite warehouse for no more than 90 days.
- Delivering an update on the Hazardous Waste Logbook that has been written Hazardous Waste from the Estate
- Re-socialization of Hazardous Waste and not Hazardous Waste SOPs and Hazardous waste storage areas to safety officers and staff.
- Replacement of bottled drinking water using a more suitable drinking water container (gallons).
- Replacement of Ex Oil Drum with Tank Profile for water storage in Nursery.
- Sacks of ex-fertilizer are not hazardous waste.
- Fertilizer sacks scattered in MR and CR have been moved to the BMS Warehouse.
- SOP for handling fertilizer sacks
- Attached documents.

Domestic waste management

Take the following corrective actions:

SCE

- Make a trash hole
- Make a garbage dump and clean up burn marks
- Schedule for domestic waste disposal
- The word **Landfill** is placed around the garbage pit.
- Safety briefing/socialization to employees and contractors for handling domestic waste and not burning waste in the company environment.

BKE

- Push the trash into the trash pit.
- Close the garbage that is full
- Create a new trash hole for the next trash can.
- Provide signboards and directions to the trash
- Make monitoring of waste transportation faster than the previous schedule.
- Attached documents.

Corrective Action (filled by organization audited):
Hazardous Waste Management.

Take the following precautions:

- Monitoring is made every month by checking by the Head of Department, Sr. Assistant and Manager
- Each logbook must go through the verification of the Head of Office and Sr. Assistant known to manager by initial
- Sticking the medical waste logbook in Hazardous Waste's warehouse
- Submitting SOPs for handling Hazardous waste in satellite warehouses may not be more than 90 days.

- Each logbook must go through verification and senior assistants are known by the manager with initials
- Sticking the medical waste logbook in Hazardous Waste's warehouse
- Monitoring of ex-Hazardous Waste (Used Oil Drums, Ex-Solar/Oil Filters, Battery Battery, Ex-Chemical Packaging) from the point of discharge (Warehouse) to the Hazardous Waste Warehouse is up to date so that no traces of Hazardous waste packaging are scattered/not monitored in. to the hazardous waste warehouse.
- Fulfilling the need for facilities and infrastructure to avoid reuse of former Hazardous waste, especially as a reservoir for consumption water, a reservoir for water both in the field and in the residential environment.
- Routine socialization regarding the potential risks of using Hazardous waste (environmental pollution, endangering the environment, health, human survival and other living creatures)
- Memo issued from Estate Manager regarding the management of former fertilizer sacks.
- Socialization to the BMS Supervision/Foreman to carry out instructions according to the issued Memo.
- Attached documents.

Domestic waste management

Take the following precautions:

SCE

- Conduct briefings to employees and contractors. Memo is not allowed to throw garbage in the wrong place other than in its place, not to burn garbage.
- Make and install a signboard prohibiting littering and burning garbage in residential areas.

BKE

- Monitoring the transportation and landfilling of the final waste bin. Attached document.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification (15 September 2022):

The company has made improvements from the results of field findings as evidenced by several documents, including:

- 7.3.1 BBE Documentation of repair of the Fertilizer Sack, in the document there is evidence of improvement and justification related to field observations. The document also attaches a Memo from the Estate Manager regarding the management of used fertilizer sacks and proof of the minutes of socialization to the BMS Supervision to carry out instructions according to the Memo that has been issued.
- 7.3.1 BBE Documentation of Hazardous Waste repair, in the document there is evidence of improvement and justification in the form of minutes of socialization regarding the definition of Hazardous Waste, potential hazards of former waste and socialization of Hazardous Waste storage areas. The company has also replaced drinking water packaging using a more suitable drinking water container (gallons) and replaced the former Oil Drum with a Tank for water storage in the Nursery.
- 7.3.1 BBF Repair documentation - Hazardous Waste and Hazardous Waste warehouse, in the document there is evidence of improvement and justification in the form of updating the manual logbook until August 2022 and submitting the medical waste logbook, as well as recap of the calculation of incoming waste < 50 kg per day.
- 7.3.1 BBF Repair documentation – Logbook, in that document contains a policy that currently all Logbooks must go through a Senior Assistant verification and be known to the manager as well as evidence that the waste logbook has been updated in the Hazardous Waste Warehouse.
- 7.3.1 BBF Hazardous Waste logbook, which contains evidence that the Logbook has been updated with the latest data.
- 7.3.1 BBF clinical waste logbook to BBF, which contains evidence that the Logbook is included with medical waste.
- 7.3.1 BBF Hazardous Waste Balance 2022, which contains the latest waste data for 2022.
- 7.3.1 BKE Landfill follow-up, which shows that the Landfill has been repaired, and that domestic waste that is scattered outside the Landfill area has been stockpiled.
- 7.3.1 SCE Pondok 2 Domestic Waste, which shows evidence that there has been a thorough improvement in the Pondok 2 area by cleaning the area from domestic waste and former burning activities. Also attached is evidence of the socialization activities that were submitted to the Contractor on August 25, 2022.

In addition to the proof of repair, the company has also provided supporting documents that can be proven, including:

- 7.3.1 Update on SOP for the Management of Ex-Fertilizers and Plastics of Ex-Fertilizers.
- 7.3.1 Update SOP for Hazardous and Non-Hazardous Waste Management.

- 7.3.1 Evidence of Socialization of Hazardous and Non-Hazardous Waste management in Bebunga POM area.
- Memo from Estate Manager regarding the management of used fertilizer sacks.

Based on all the evidence of improvement that has been shown, the **non-conformity has been fulfilled by Observation.**

Follow up on next audit (filled by auditor):

Follow up during the next audit assessment (completed by the auditor):

Medical waste management

- Based on the results of field observations at Bakau Estate, it was found that the company has a clinic located at the CHC (Central Housing Complex) and has a Central Clinic located at Central Bebunga Estate. These clinics are known to produce medical waste from their operational activities, but the storage of this waste is carried out at each clinic (not stored in the licensed LB3 TPS at Bebunga Factory) and the storage period for the medical waste has exceeded 180 days.
- The results of the review of licensing documents found that the company had a TPS LB3 Permit based on Decree No. 503/0272/PSLB3-P-DPMPTSP/2021 which was ratified by the Head of the One Stop Integrated Services and Investment Service (DPMPTSP). The permit explains the types of waste that can be stored in TPS LB3, but medical waste is not included.
- The results of a review of waste management documents found that in the company's B3 Waste Logbook and Balance Sheet there was no information regarding the medical waste produced by the company.
- Based on Festronik dated 05-04-2023, the medical waste sent to party III was 0.118 tons. In 2022 there will be no medical waste deliveries. (Medical waste stored >180 days)
- Management procedures and storage periods for waste at Satellite TPS and/or unit and central clinics cannot be demonstrated, before it is collected at licensed LB3 TPS (BBF). Based on data and interviews, it varies from 2 weeks – 3 months.

Liquid waste management (POME)

- Based on the results of the document review, it is known that PT Langgeng Muaramakmur has an LA (Land Application) Operational Feasibility Letter from the Kotabaru Regency Environmental Service in accordance with Decree No. 660.3.4/1081/DLH-PPKL/XI/2022 dated 28 November 2022 with the total LA area provided being 571.9 Ha.
- The results of field observations carried out at Bebunga Estate and Bakau Estate revealed that the company had not implemented LA activities at the designated locations in Bebunga Estate (Blocks F 16, F 17, F 18, F19) and for Bakau Estate only applications had been carried out in a few blocks. (Blocks D26, D27 & E27) with an area of 43.98 Ha or 7% of the permit granted. Apart from that, the condition of the Flat Bed at the location observed was muddy, shallow and application rotation was not carried out in other areas/blocks.
- In the Agronomy Reference Manual document (Policy No.: 110/EST-ARM/08) in section 8.3 Fertilizing Palm Oil Plants, Application of Liquid Waste (POME) explains the application dose for each tree on Coastal, Inland and Irrigation System soils. For example, on land the Irrigation System is 750 tonnes/ha/year (3-4x application), but this is not carried out by the company (in accordance with the explanation in the previous point).
- LA 2023 application illustration.
 - POME delivered in 2023 will vary from 8,000-10,000 tons/month or 96,000-120,000 tons/year
 - Realization of LA covering an area of 43.98 Ha
 - Application to LA ranges from 2,180 – 2,700 tons/ha/year

Based on the waste management above, the company has not been able to show evidence that waste management (liquid waste and medical waste) is in accordance with applicable procedures and statutory regulations.

Verified by : **Arief Tajalli/ I Wayan Sudi Antara**

NCR No.	: 2022.06	Issued by	: Arief Tajalli
Date Issued	: 27 August 2022	Time Limit	: 25 November 2022
NC Grade	: Major	Date of Closing	: 7 November 2022

Standard Ref. & Requirement

7.12.4

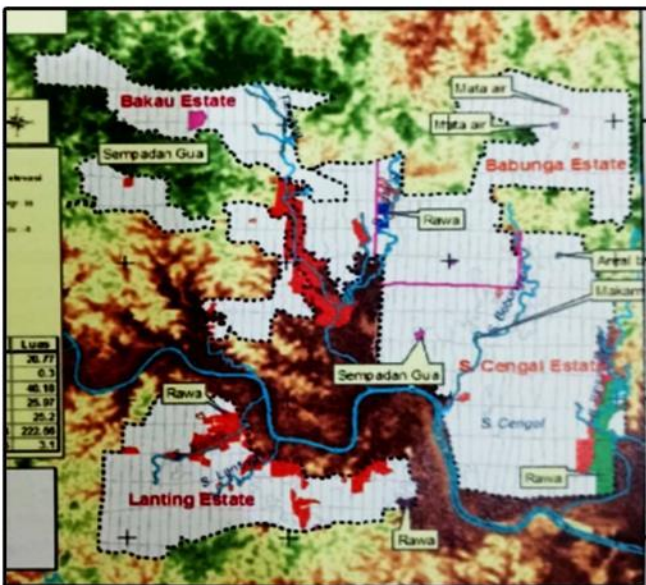
HCV and HCS forest after 15 November 2018, peatlands and other conservation areas that have been identified, protected and/or enhanced. Integrated management plans to protect and/or enhance HCV and HCS forest, peatlands and other conservation areas are developed, implemented and adapted where necessary, and complemented by monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and covers areas that are directly managed and takes into account the relevant wider landscape level (if such landscapes have been identified).

Evidence observed (filled by auditor):

Based on the results of document verification and field visits at several locations, the following information was obtained:

1. Based on the documents resulting from the 2009 HCV study, information was obtained that there were 2 HCV classifications namely the actual HCV area of 338.18 Ha which must be managed and the potential HCV area of 1,382.82 Ha which is recommended to be managed. For the actual HCV areas, all of them are inside the HGU, while for the potential HCV areas they are inside and outside the HGU area. However, based on the results of field observations and document verification, it shows that the HCV conditions managed by the company are not in accordance with the documents resulting from the 2009 HCV study because not all Actual and Potential HCV areas have been managed by the company. HCVs that are currently being carried out, maps and areas of realized HCVs that are managed, as well as areas of HCVs included in the scope of certification.
2. The company has not been able to show an integrated management plan document that has been reviewed at least once in five years which has been developed in consultation with relevant stakeholders. This is considered quite important because the actual conditions in the field for several potential HCV locations according to the results of the 2009 HCV study have been identified by the company as enclave and/or occupation areas. The results of field observations in the HCV area in Bakau Estate Field A021, Block E50 show that the enclave area is still forest, so the potential threat of clearing HCV areas is quite high considering other potential HCV areas located in swamps and inundated areas have already been cleared by Public.
3. Based on the analysis of the results of the 2009 HCV study documents, the scope of the document review refers to HGU No. 12 of 1997 and HGU No. 04 of 1998 with a total area of 16,361.77 Ha. However, when referring to the operational map and satellite imagery, it shows that there is an area of the company that is included in the scope of certification but is not included in the scope of the HCV study, namely Division 4, Bebunga Estate with an area of 628.98 ha. This is due to the fact that the area only had HGU in 2019. The following is a comparison map between the scope of certification and the map resulting from the HCV study, including:

Map of HCV 2009 study



Map of PT LMR operational



Non-Conformance Description (filled by auditor):

Based on the evidence obtained, this is a non-compliance because the company has not been able to demonstrate several things, including:

- Justification regarding the determination of HCV management that is currently being carried out
- Map and extent of managed HCV realization
- the extent of HCV included in the scope of certification
- Management plan that has involved relevant stakeholders.
- Results of the HCV assessment for the scope of Division 4, Bebunga Estate.

Root Cause Analysis (filled by organization audited):

1. Determination of the area and subject of HCV determined by the plantation is not appropriate because there has been no review regarding the determination by the plantation unit, resulting in a non-conformity between the HCV studied by Yasbi and the HCV area by each plantation unit.
2. The map did not match the field conditions because when conducting the study Yasbi used a map made by the plantation using the Excel program so that the location of the HCV could be shifted.
3. The management plan has not yet been submitted because the village is experiencing a change in village head elections from June to August 2022, so the village administration has not yet provided a definite schedule for conducting an HCV review with the village.
4. The BBE Division 4 area has not been included in the study because the area was still under community control from 2007 to 2014. After completion, Division 4 was split into nucleus estates and KKPA details in the attached document.

Auditor Verification (6 September 2022):

The root of the problem has been accepted.

Correction (filled by organization audited):
Submitting to the auditors:

1. Submit the actual HCV Map managed in the Yasbi review HCV assessment.
2. Submitting the determination by management of the HCV area that is included in the scope of certification according to the actual that there is justification for the determination of HCV.
3. Submit a management plan that has involved the village community according to the results of discussions with the village community.
4. Submit a review of the Yasbi HCV report to DIV 4 BBE.
5. Attached document.

Auditor Verification (6 November 2022):

The root of the problem has been accepted.

Corrective Action (filled by organization audited):

Keeping the fulfillment document by RSQM and always coordinating with SQM team regarding HCV issues.

Auditor Verification (6 November 2022):

The root of the problem has been accepted.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification (15 September 2022):

1. The company shows documents of Final HCV review results, these documents are different from those verified by the auditor during the audit. However, when referring to the HCV document that was sent, the table is shown as follows:

NKT /Potensi NKT	Luas (Ha)	Persen (%)
NKT 1	87.66	0.54%
NKT 1 dan NKT 2	3.49	0.02%
NKT 1 dan NKT 3	6.75	0.04%
NKT 1, NKT 2, NKT 4 dan NKT 5	586.00	3.58%
NKT 1, NKT 2, NKT 3, NKT 4 dan NKT 5	39.02	0.24%
NKT 1, NKT 3, NKT 4 dan NKT 5	421.69	2.58%
NKT 1, NKT 4 dan NKT 5	105.14	0.64%
NKT 4 dan NKT 5	9.96	0.06%
NKT 6	0.30	0.002%
Total luas NKT/Potensi NKT*	1,260.01	7.70
Luas Areal PT. Langgeng Muaramakmur	16,361.77	

The table states that the scope of the HCV study is 16,361.77 Ha or equivalent to the area of the 1997 HGU + 1998 HGU. And the 2019 HGU is not included in this area. HGU 2019 is HGU owned for Division 4 Bebunga Estate. This is the basis for the findings, and the table actually strengthens the justification of the audit findings and is irrelevant when used as evidence of improvement. The area is also the same as the document used by the auditor when conducting field verification.

- In the NCR document it is stated that one of the findings is that the company has not been able to show the Map and extent of the HCV realization being managed. The map in question is a map of the HCV areas that are currently being managed, because during field observations, all the Estates visited had different HCV management maps (it is not clear where the reference came from because it was different from the 2009 HCV document they had). Based on this, the auditor concluded that the company does not yet have an actual HCV management map that is currently being managed by the company which is a guideline for HCV management for the entire scope of PT LMR. The map that is owned also includes areas outside the HGU which, in practice, in the field, areas outside the HGU are not managed by the company.
- Regarding the area, the company has not been able to show how many HCV areas are included in the HGU, how much is outside the HGU, and how much can actually be managed. When referring to the document "7.12.4. Management Review and Review, Determination of PT LMR 2022 HCV Assessment" shows the following data:

LUAS AREA PENGELOLAAN HCV PT LMR												
NO	PT	ESTATE	Berdasarkan HCV Statement Sime Darby			Per Estate	PENETAPAN BERDASARKAN KAJIAN YASBI					
			LUAS	HCV	DESCRIPTION		NKT1	NKT2	NKT3	NKT4	NKT5	NKT6
1	LMR	BEBUNGA	1259.71	HCV1,2,3,4,5	Secondary forest with wildlife, conservation area, riffer buffer zone, social and cultural activity	135.67	0	0	0	135.67	0	0
2	LMR	BAKAU			561.91	0	0	0	546.11	25.2	15.8	
3	LMR	SG. CENGAL			327.22	0	0	0	319.41	3.1	7.81	
4	LMR	LANTING			286.29	0	0	0	283.49	0	2.8	
3	LMR	TOTAL				1311.09	0	0	0	1001.19	28.3	23.61

Luas total HCV berdasarkan sertifikasi RSPO adalah 1024,8 Ha

Luas total HCV berdasarkan sertifikasi ISPO adalah 1311.09 Ha

From the above data, it is not clear where the source of the figure for 1024.8 Ha comes from, because when added together the HCV areas included in the scope of certification are only 983.87 Ha. In the table, the column "Determination Based on YASBI Study" is also not the same as the 2009 YASBI study results (first picture). And when referring to the first picture which is the result of the 2009 HCV study, it states that the company's HCV area is 1261.01 Ha and not 1311.09 Ha as the result of management's review. There is no explanation for the difference in area. The YASBI study results also include HCV areas outside the HGU, so logically, the HCV areas that are inside the HGU and can actually be managed should be smaller than the above data.

- Apart from that, the actual conditions on the ground are different, for example for the HCV area in the Bakau Estate as shown below:



In actual conditions in the field, the area circled in red is an HCV area, but the actual condition has become replanted oil palm. Therefore, the actual condition of the HCV area which is currently being managed by the company is no longer the same as the 2009 HCV assessment document.

Based on the explanation above, the **non-conformity has not been accepted**, because the company has not been able to show the results of the identification of the HCV area for Division 4, Bebunga Estate. In addition, the company has also not been able to show data on the size of the HCV area that is actually currently being managed because according to the company's justification stated in the document "7.12.4 Justification Sheet – HCV" which explains that several HCVs in the form of forest have been claimed by the community on the grounds of it is the land of their ancestors so some parts are managed. Thus, based on this, the actual area of HCV that is currently being managed is much smaller than the results of the 2009 HCV assessment.

Auditor Verification (6 November 2022):

The company has sent several proofs of improvement, including:

1. Regarding the justification in determining the current HCV management, the map and actual area of HCV being managed, as well as the area of HCV included in the scope of certification, the company has been able to show the document DETERMINING HCV AREA BASED ON THE RIVIEW OF HCV POTENTIAL BY YASBI AT PT LMR. The document shows the actual area currently managed by the company, which is 1,092.62 Ha (including the Lanting Estate) or 789.05 Ha which is included in the scope of RSPO certification. The document also includes an actual map of the HCV areas that can be managed, so that evidence of non-compliance at this point can be fulfilled.
2. Regarding the integrated management plan document which has been reviewed at least once in five years which has been developed in consultation with relevant stakeholders. The company shows that the Minutes of LMR document cannot carry out a 5-year review. The document shows the obstacles why the activity cannot be carried out, as well as the timeline for a 5-year review, namely in December 2022.
3. Related to the fact that there is an area of the company that is included in the scope of certification but not included in the scope of the HCV study, namely Division 4, Bebunga Estate with an area of 628.98 ha. The company showed documents RIVIEW OF YASBI's HCV REPORT ON DIV 4 BBE PT LMR and DETERMINATION OF HCV AREA BASED ON RIVIEW OF HCV POTENTIAL BY YASBI AT PT LMR. The document explains the history of why division 4 was not included in the scope of the study area, the justification that the study had been carried out for a larger area, as well as the results of the latest identification of potential HCV areas carried out internally by involving the community for the specific area of division 4. Identification results This indicates that the Division 4 area does not contain any HCV areas in it.

Based on all documents submitted by the Auditee, several conclusions can be drawn, including:

4. The company has determined that the HCV management that is currently being carried out is only for the scope of the management area that is inside the HGU, while for the area outside the scope of the company's HGU which is a potential HCV area, it can no longer be managed because most of it has been managed by the community such as being a rice field area. or oil palm plantations.
5. The company also has the latest map and extent of HCV realization with the scope of HCV being included in the scope of ISPO and RSPO certification only. The scope of the HCV area is Lanting Estate 303.57 Ha; Bakau Estate 109.3 Ha; Sungai Cengal Estate 221.96 Ha and Bebunga Estate 457.79 Ha with a total area of 1092.62 Ha HCV. All potential HCV areas that are outside the scope have been excluded from the latest HCV management map.
6. Regarding the management plan that has involved relevant stakeholders, the company has a schedule that will be carried out in March 2022. However, the company's justification states that in March 2022, the conditions for carrying out activities that

cause crowds are not yet allowed to anticipate Covid-19. So that the company will do it in December 2022. Related to this, it is necessary to carry out further observations on the next surveillance.

7. For the results of the HCV assessment for the scope of Division 4, Bebunga Estate, the attached documents also represent the results of the study. The auditor's considerations regarding the fulfillment of the results of the study for the scope of the Division 4 area, among others:
- The HCV area identification activity carried out by YASBI in 2009 was a Landscape level study and was not limited to the boundaries of the HGU area owned by PT LMR, this was evidenced by the existence of potential HCV areas outside the scope of PT LMR. For Division 4 Bebunga Estate, the location is not included in a potential HCV area so that the results obtained from the internal HCV identification and by YASBI have the same result, namely there is no HCV area at that location.
 - Based on historical analysis of the location of Division 4, Bebunga Estate, information was obtained that the location has been a palm oil plantation since 2001. However, because the location was claimed by the community, the company did not manage the location, so that the process of obtaining the HGU was also hampered until finally it was new. in 2014 it was returned to the company and in 2019 it just had an HGU. This is why the area of division 4, Bebunga Estate is not included in the scope of the HCV assessment, because the HCV study was conducted in 2009.
 - Based on the land cover analysis with a timeline of 2010 – 2020, it can be concluded that there are no areas of primary or secondary forest cleared. The land cover in the entire area is only oil palm.

Based on all the evidence submitted by the company, as well as the auditor's considerations regarding the HCV area in Division 4 Bebunga Estate, it is concluded that the **non-conformity has been met by observation**.

Follow up on next audit (filled by auditor):

Follow up saat penilaian audit berikutnya (dilengkapi oleh auditor):

The company showed the revised HCV area identification document carried out by YASBI (2009) with the following results:

II.2. RINGKASAN TEMUAN NKT

Ekosistem kawasan UP PT. Langgeng Muaramakmur merupakan bagian dari ekosistem Teluk Pamukan dan DAS Cengal. Ekosistem ini terdiri dari ekosistem riparian, rawa air tawar, hutan tanah kering, kebun kelapa sawit, ladang dan kebun masyarakat. Ekosistem ini terdistribusi dalam empat kebun, yaitu Kebun Lanting, Bakau, Bebunga dan Sungai Cengal. Kondisi tutupan lahan di dalam dan sekitar UP PT. Langgeng Muaramakmur disajikan pada **Gambar Peta 2.7**.

Didasarkan hasil analisis lapangan diketahui bahwa di dalam kawasan UP dijumpai adanya nilai-nilai konservasi tinggi, baik aktual maupun Potensi. Kawasan bernilai konservasi tinggi tersebut disajikan pada **Tabel 2.3**.

Tabel 2.3. Rekapitulasi NKT/Potensi NKT di dalam kebun kelapa sawit PT. Langgeng Muaramakmur

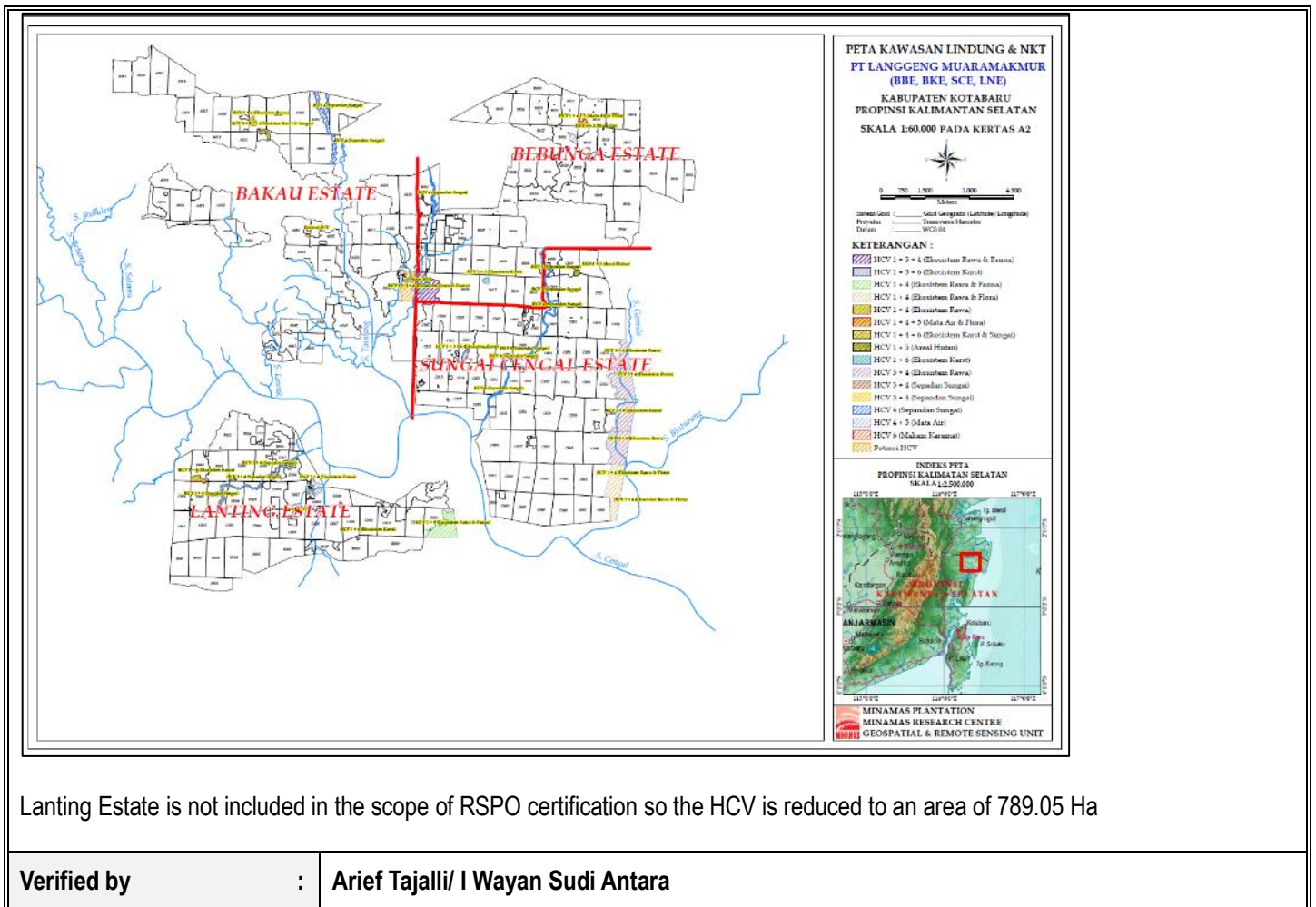
NKT /Potensi NKT	Luas (Ha)	Persen (%)
NKT 1	87.66	0.54%
NKT 1 dan NKT 2	3.49	0.02%
NKT 1 dan NKT 3	6.75	0.04%
NKT 1, NKT 2, NKT 4 dan NKT 5	586.00	3.58%
NKT 1, NKT 2, NKT 3, NKT 4 dan NKT 5	39.02	0.24%
NKT 1, NKT 3, NKT 4 dan NKT 5	421.69	2.58%
NKT 1, NKT 4 dan NKT 5	105.14	0.64%
NKT 4 dan NKT 5	9.96	0.06%
NKT 6	0.30	0.002%
Total luas NKT/Potensi NKT*	1,260.01	7.70
Luas Areal PT. Langgeng Muaramakmur	16.990,75	

The company shows the 2022 HCV Review document as follows :

KEBUN	Divisi	HCV	OBJEK	LUAS	LOKASI
Lanting Estate	III	1+4	Fauna + Swamp	17.28	C12

	III	1+ 6	Gua Paya Burung	2.80	B08
	I	3+ 4	Swamp Ecosystem	98.72	D08.D09
	III	3+ 4	Boundary S. Rawa Selam	52.01	D003.D004.D005
	III	3+ 4	Boundary S. Lanting	38.59	D007. D011
	I	1+4	Swamp	94.17	E002
Total HCV	6			303.57	
Bakau Estate	I	1+4+6	Fauna + River	26.84	A010
	I	4	Boundary Anak S. Tamiang	61.68	A002
	I	4	Boundary S. Tamiang	17.21	A008
	I	1+4	Anak S. Tamiang Di tengah Blok B 41(42)	3.57	A005
Total HCV	4			109.30	
Sungai Cengal Estate	I	1+3+6	Sekumbang Cave (Karst Ecosystem)	7.51	C012
	II	1+5	Sumur Tujuh spring forested area	3.10	C019
	III	1+4	Swam[(Flora)	35.10	C043
	III; IV	3+4	Swamp Ecosystem	90.21	C028. C032. C036. C042
	II; III	6	Sacred grave	0.20	C009
	I	4	Boundary S. Bebunga	85.84	C056. C051. C027. C023
Total HCV	6			221.96	
Bebunga Estate	I	1+3+4	Swampy area (FAUNA) +25.97 Ha	390.53	B013 dan B019
	I	1+6	Cave	3.03	B017
	III	1+4+5	Water Springs and surroundings (FLORA)	1.26	B036
	III	4+5	Water Springs	1.26	B026
	I	4	Boundary S. Lintang	61.71	B002
Total HCV	5			457.79	

KEBUN	Total HCV	LUAS
Lanting Estate	6	303,57
Bakau Estate	4	109,30
Sungai Cengal Estate	6	221,96
Bebunga Estate	5	457,79
Total		1.092,62



3.4.2. Identification of Non-conformity at ASA-2.1

NCR No.	:	2023.01	Issued by	:	I Wayan Sudi Antara
Date Issued	:	16 September 2023	Time Limit	:	14 December 2023
NC Grade	:	Minor Rise to Major	Date of Closing	:	13 December 2023
Standard Ref. & Requirement	:	7.3.1 There is a waste management plan that is documented and implemented in accordance with applicable laws and regulations, including reduction, recycling, reuse and disposal, based on toxic characteristics (toxicity) and other hazards.			
Evidence observed (filled by auditor):					
Medical waste management					
Based on the results of field observations at Bakau Estate, it was found that the company has a clinic located at the CHC (Central Housing Complex) and has a Central Clinic located at Central Bebunga Estate. These clinics are known to produce medical waste from their operational activities, but the storage of this waste is carried out at each clinic (not stored in the licensed LB3 TPS at Bebunga Factory) and the storage period for the medical waste has exceeded 180 days.					
<ul style="list-style-type: none">• The results of the review of licensing documents found that the company had an LB3 TPS Permit based on Decree No. 503/0272/PSLB3-P-DPMPTSP/2021 which was ratified by the Head of the One Stop Integrated Services and Investment Service (DPMPTSP). The permit explains the types of waste that can be stored in TPS LB3, but medical waste is not included.• The results of a review of waste management documents found that in the company's B3 Waste Logbook and Balance Sheet there was no information regarding the medical waste produced by the company.• Based on Festronik dated 05-04-2023, the medical waste sent to party III was 0.118 tons. In 2022 there will be no medical waste deliveries. (Medical waste stored >180 days)• The procedures for managing and storing waste at the Satellite TPS and/or unit and central clinics have not been demonstrated, before it is collected at the licensed LB3 TPS (BBF). Based on data and interviews, it varies from 2 weeks – 3 months.					
Liquid waste management (POME)					
<ul style="list-style-type: none">• Based on the results of the document review, it is known that PT Langgeng Muaramakmur has an LA (Land Application) Operational Feasibility Letter from the Kotabaru Regency Environmental Service in accordance with Decree No. 660.3.4/1081/DLH-PPKL/XI/2022 dated 28 November 2022 with the total LA area provided being 571.9 Ha.• The results of field observations carried out at Bebunga Estate and Bakau Estate show that the company has not carried out LA activities at the designated locations in Bebunga Estate (Blocks F 16, F 17, F 18, F19) and for Bakau Estate only applications have been carried out on several blocks only (Blocks D26, D27 & E27) with an area of 43.98 Ha or 7% of the permit granted. Apart from that, the condition of the Flat Bed at the location observed was muddy, shallow and application rotation was not carried out in other areas/blocks.• In the Agronomy Reference Manual document (Policy No.: 110/EST-ARM/08) in section 8.3 Fertilizing Palm Oil Plants, Application of Liquid Waste (POME) explains the application dose for each tree on Coastal, Inland and Irrigation System soils. For example, on land the Irrigation System is 750 tonnes/ha/year (3-4x application), but this is not carried out by the company (in accordance with the explanation in the previous point).• Illustration of the LA 2023 application.<ul style="list-style-type: none">- POME delivered in 2023 will vary from 8,000-10,000 tons/month or 96,000-120,000 tons/year- Realization of LA covering an area of 43.98 Ha- Application to LA ranges from 2,180 – 2,700 tons/ha/year					
Non-Conformance Description (filled by auditor):					

Berdasarkan pengelolaan limbah di atas, perusahaan belum dapat menunjukkan bukti pengelolaan limbah (Limbah Cair dan Limbah Medis) telah sesuai dengan prosedur dan peraturan perundangan yang berlaku.

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

The LA area according to the permit is 571.9 Ha, which is in Bakau Estate = 150 Ha (Blocks D26, D27, E26, E27, D28, E28 and F27) and only 43.98 Ha is available in blocks D26, D27 & E27 and Bebunga Estate = 421.9 Ha in Blocks G16, G17, G18, G19, G20, G21, H17, H18, H19, H20, H21, F18, F19 and F20 with Flat Bed conditions, no POME can be applied yet. The construction of Flat Beds in Bebunga Estate has been completed in Blocks F18, F19 and F20, however the pipe installation has not been completed due to work constraints from the contractor. Due to the lack of LA area (availability of Flat Beds), application rotation is not yet in accordance with procedures.

Correction *(filled by organization audited):*

Gradually increase the number of Flat Beds in Bebunga Estate so that POME application rotation can be carried out according to procedures (Process of pipe installation work on Flat Beds in Bebunga Estate is attached)

Corrective Action *(filled by organization audited):*

- Monitoring work on increasing the number of Flat Beds as planned (Monitoring attached)
- Appointed PIC to monitor the work process of increasing the number of Flat Beds (SK PIC monitoring attached)

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

Auditor Verification dated October 9, 2023

The company has demonstrated an acceptable root cause analysis and corrective action analysis, but has not been able to show supporting documents for proof of improvement so that the nonconformity is declared **not yet fulfilled**.

Auditor Verification dated December 13, 2023

The company has shown proof of improvement as follows:

- PIC job decree dated September 16 2023
- Work completion schedule with target completion in February 2024
- Inspection Minutes dated 14-10-2023 LA (POME) BBE Installation Work covering an area of 20.50 Ha from the target of 91.64 Ha which is equipped with a Work Realization Plan Map and photo documentation of activities

Based on the evidence of improvement above, **NCR 2023.01** can be fulfilled (closed) and observations will be carried out at the next stage.

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

Verified by : **I Wayan Sudi Antara**

3.4.3. Opportunity for Improvement

No	Ref.Std.	Description
1	3.4.1	<p>Social and environmental impact assessments in new plantings or operations, including Mill, are carried out independently and participatively by involving affected stakeholders, including impact studies of farmer/supplier plantation schemes (if any). The assessment is documented.</p> <ul style="list-style-type: none"> The company has HGU covering an area of 16,990.75 Ha (Kalimantan Selatan Province covering an area of 15,533 Ha. Kalimantan Timur Province covering an area of 828.7741 Ha + 628.98 Ha) The company has made changes to environmental documents (AMDAL, 1995) including: Environmental Management Document (DPLH, 2011) for Palm Oil Plantation Activities Covering an Area of 1,213 Ha. in Prov. Kalimantan Timur UKL-UPL Document (2013) Construction and Operation of a Special Terminal and Supporting Facilities (CPO Pier 10.11 meters long and Kernel Pier 16.44 meters long) Kalimantan Selatan Province Addendum Documents for ANDAL and RKL-RPL Type C (2023) Palm Oil Plantation and Processing Activities With a Bebunga Factory Capacity of 60 FFB/Hour and other supporting facilities with a land area of ±10,812.29 Ha located in Bakau Village, Betung Village, Pamukan Indah Village, Balamea Village, Mulyo Harjo Village, Kalian Village, Tamiang Village, Harapan Baru Village, Lintang Jaya Village, Binturung Village and Manunggal Lama Village, Pamukan Utara Sub Districe and Durian River Sub District, Kotabaru District, Kalimantan Selatan Province. The company shows a letter from the Head of the Environmental Service of Kotabaru District No. 660/1019/Talting-DLH/2023 dated 23 August 2023 Regarding Document Revision Process. Contains improvements to the AMDAL Addendum document which does not yet cover plantation afdeling. The company shows a letter from the Head of the Environmental Agency of Kotabaru District No. 660/226/DPLH/2023 dated 25 August 2023 Regarding the Document Revision Process. Load the DPLH Addendum request. <p>Companies must continue to improve environmental documents in accordance with the scope of operational areas and the scope of all operational activities</p>

3.4.4. Noteworthy Positive Components



No	Description
1	Company commitment and enthusiasm in implementing RSPO certification.
2	Good certification team collaboration in presenting and accompanying RSPO certification activities.
3	The company has obtained ISPO Certificate.
4	The company no longer uses pesticides containing the active ingredient paraquat.

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Gender Committee (Bakau Estate, Bebunga Estate, Sungai Cengal Estate)</p> <p>The management of the Gender Committee consists of men and women, each of whom has responsibilities and consists of several divisions in carrying out organizational activities.</p> <p>The company supports and facilitates activities carried out and proposed by the Gender Committee. This can be seen from the company's attention by providing examples of socialization regarding the dangers of diabetes, providing advice and infrastructure for sports activities, facilitating rooms for regular meetings once every 2 weeks, and support in social activities. .</p> <p>Over the past year, the Gender Committee stated that there had never been any incidents of sexual harassment or violence. The company is also said to not employ minors.</p> <p>The Gender Committee also said that the company cares about the continuity of the Gender Committee by creating a complaint book, the results of which will be presented in social dialogues held once every two weeks. Apart from that, the Gender Committee also said that the company cares about its employees, such as if a female employee is pregnant, they will immediately be transferred to work in a unit with light work. Apart from that, the company also provides additional food intake during pregnancy which is carried out during posyandu activities.</p> <p>The company supports and facilitates activities carried out and proposed by the Gender Committee. This can be seen from the company's attention by providing examples of socialization regarding the dangers of diabetes, providing advice and infrastructure for sports activities, facilitating rooms for regular meetings once every 2 weeks, and support in social activities. .</p> <p>Over the past year, the Gender Committee stated that there had never been any incidents of sexual harassment or violence. The company is also said to not employ minors.</p> <p>The Gender Committee also said that the company cares about the continuity of the Gender Committee by creating a complaint book, the results of which will be presented in social dialogues held once every two weeks. Apart from that, the Gender Committee also said that the company cares about its employees, such as if a female employee is pregnant, they will</p>	<p>There were no negative issues raised by the interviewees related to issues of sexual harassment, domestic violence, and work equality for men and women.</p> <p>The Gender Committee plays an active role in all members' needs as well as matters relating to the company's role towards employees.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
immediately be transferred to work in a unit with light work. Apart from that, the company also provides additional food intake during pregnancy which is carried out during posyandu activities.	
Manpower Agency of Kotabaru District <ul style="list-style-type: none"> There have been no employment-related problems reported to the agency and so far the company has fulfilled its obligations both in terms of providing minimum wages and in terms of reporting. The company still uses contract workers, but their use has been reported and the reasons for using these workers explained. 	There is no negative issue
Environmental Agency of Kotabaru District <p>So far there have been no issues related to pollution or other environmental disturbances caused by the company's operational activities. The company is currently in the stage of preparing environmental documents.</p>	There is no negative issue
Land Office of Kotabaru District <p>There are no land disputes in the company's operational areas and from the HGU utilization report sent by the company there are no indications of abandoned land in the company's operational areas.</p>	There is no negative issue
Village Representatives (Lintang Jaya Village and Sekodayan Village) <p>The company's existence has had various impacts on the surrounding community, one of the positive impacts of which is the realization of various assistance in CSR programs and the development of schemes smallholder area.</p>	There is no negative issue
Labor Union (Bebunga Estate, Bebunga Factory and Bakau Estate) <p>The company does not intervene in the existence of labor unions and has given workers freedom to organize. Workers have understood the mechanism for submitting complaints through the Labor Union, which has submitted several complaints regarding improvements to facilities and infrastructure and the appointment of contract workers.</p>	There is no negative issue
Scheme Smallholder (Koperasi Bina Swadaya Karya) <p>The form of collaboration is full management and all information provided is transparent, including information on prices and production of the FFB produced.</p>	There is no negative issue
CPO & PK Transporter (CV S Mutiara Senja) <p>The contractor has paid wages to workers not lower than the minimum wage and provided PPE as well as health and</p>	There is no negative issue

Public Issues (Institution/ NGO/Community)	Auditor Verification
employment guarantees to its workers. The contractor has stated that he is willing to be audited by an independent audit institution and so far there have been no complaints regarding the collaboration that has been established.	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Langgeng Muaramakmur Head of Sustainability & Quality Management</p>  <p><u>Alagendran Maniam</u> Wednesday, 13 December 2023</p> </div> <div style="text-align: center;"> <p>PT Mutuagung Lestari Tbk Lead Auditor</p>  <p><u>Octo HPN Nainggolan</u> Wednesday, 13 December 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Manpower Agency	Kotabaru Regency	-	By Phone	12 September 2023	✓	
2	Environmental Agency	Kotabaru Regency	-	By Phone	12 September 2023	✓	
3	Land Office	Kotabaru Regency	-	By Phone	12 September 2023	✓	
4	Village Representatives (Lintang Jaya Village and Sekodayan Village)	Kotabaru Regency	-	By Phone	12 September 2023	✓	
5	Scheme Smallholder (Koperasi Bina Swadaya Karya)	Kotabaru Regency	-	By Phone	12 September 2023	✓	
6	CPO & PK Transporter (CV S Mutiara Senja)	Kotabaru Regency	-	By Phone	12 September 2023	✓	
7	Gender Committee (Bakau Estate, Bebunga Estate, Sungai Cengal Estate)	Kotabaru Regency		Direct Interview	12 September 2023	✓	
8	Labor Union (Bebunga Estate, Bebunga Factory and Bakau Estate)	Kotabaru Regency		Direct Interview	12 September 2023	✓	
9	Bebunga Factory: • Weigh Bridge 1 Worker • Security Post 2 Workers • Grading 5 Workers • Engine Room 1 Worker • Boiler 3 Workers • Press 2 Workers • Emergency Respose Officer 5 Workers	Kotabaru Regency		Direct Interview	12 September 2023	✓	
10	Bebunga Estate • Harvest 6 people • Harvest 4 people • 3 Person Manual Maintenance • Pruning 3 people • 1 Person Warehouse • BSS House 1 Person	Kotabaru Regency		Direct Interview	12 September 2023	✓	
11	Bebunga Estate: • 1 HCV Officer • 1 GIS Officer	PT Langgeng Muaramakmur	-	Interview	12 September 2023	✓	
12	Sungai Cengal Estate: • 1 HCV Officer • 1 GIS Officer • 3 warehouse Officers • 1 Daycare Worker • 2 Firefighting Members • 2 Foreman & 6 Pesticide	PT Langgeng Muaramakmur	-	Interview	13 September 2023	✓	

	Applicators						
	<ul style="list-style-type: none"> 1 Foreman & 4 Manurers 						
13	Bebunga Factory: <ul style="list-style-type: none"> 3 Warehouse Officers 1 WWTP Worker 1 WTP Worker 3 Mechanics 	PT Langgeng Muaramakmur	-	Interview	12 September 2023	✓	
14	NGO (WALHI, WWF, and Sawit Watch)	Jakarta	-	By Email	06 September 2023		✓

Appendix 2. Assessment Program

DATE / TANGGAL	04 – 09 September 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 11 September 2023		
05.50 – 09.05	Jakarta (CGK) → Balikpapan (BPN) (GA-560)	All Auditor
09.05 – 16.00	Balikpapan → Audit Location	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"> Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders. Stakeholder consultation to affected communities surrounding the plantations and previous land owner as well as Local NGO. public consultation with stakeholder to relevant agency in Kotabaru Regency by phone. Document review, basic info verification and metric template verification. 	RIU/YUS RIU/YUS RIU/YUS RIU/YUS
08.00 – 12.00	Field Observation to Bebunga Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect. Implementation of Environmental, and Waste Management Aspect (inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	SEP/WYN/OCT SEP/WYN/OCT SEP/WYN/OCT
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field Observation to Bebunga POM Aspect to be verified: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge). Implementation of Environmental Aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, WTP, Fire Control Simulation. Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO). POME Pond, Land Application, Empty Bunch Area. 	RIU RIU/SEP/YUS SEP/YUS/OCT WYN
16.30 – 17.00	Submission of audit progress.	All Auditor
Wednesday, 13 September 2023		

DATE / TANGGAL	04 – 09 September 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Field Observation to Bakau Estate, and Sungai Cengal Estate Aspect to be verified: <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect. • Implementation of Environmental, and Waste Management Aspect (inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	RIU YUS/SEP/OCT WYN
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
16.30 – 17.00	Submission of audit progress.	All Auditor
Thursday, 14 September 2023		
08.00 – 12.00	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
16.30 – 17.00	Submission of audit progress.	All Auditor
Friday, 15 September 2023		
08.00 – 10.00	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
10.00 – 17.00	Traveling Site → Balikpapan	All Auditor
17.00 – ...	Transit at Balikpapan	All Auditor
Saturday, 16 September 2023		
08.00 – 09.00	Internal discussion by auditor team preparing for Closing Meeting.	All Auditor
09.00 – 10.30	CLOSING MEETING <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion). • Comments, Responses and Questions 	All Auditor
12.35 – 13.45	Balikpapan (BPN) → Jakarta (CGK) (GA-567)	All Auditor