



**RSPO CERTIFICATION ASSESSMENT REPORT
PUBLIC SUMMARY**

**SIME DARBY PLANTATION SDN. BHD.
CERTIFICATION UNIT (SOU 28) - BINUANG
CERTIFICATION UNIT (SOU 29) – GIRAM
CERTIFICATION UNIT (SOU 30) – MEROTAI
CERTIFICATION UNIT (SOU 30B) – MOSTYN**

**KUNAK & TAWAU DISTRICT,
SABAH, MALAYSIA**

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1.0 Scope of the Certification Assessment

1.1 Introduction

This public summary describes four certification units of Sime Darby Plantation Sdn. Bhd. (SDPSB) namely SOU 28- Binuang, SOU 29 - Giram, SOU 30 - Merotai and SOU 30b - Mostyn.

Each strategic operating unit (SOU) or management unit is equivalent to a certification unit as defined in the RSPO Certification Systems Document. Each SOU consists of one mill and its supply base. The supply base is made up of estates owned by SDPSB and small holders' plantations nearby to the oil mill.

All estates owned by SDPSB contributing FFB to the SOUs undergoing RSPO certification were assessed during this assessment. However, another company-owned estate supplying FFB to the SOUs (Jeleta Bumi Estate) was not assessed. Jeleta Bumi Estate supplies FFB to Binuang Oil Mill and Giram Oil Mill. Jelata Bumi is part of another SOU which will be assessed later.

This assessment also did not cover the small holders' plantations supplying FFB to the mills.

Details of the SOUs covered by the assessment are described in the following table:

Table 1.0: Management Unit covered in the Assessment

No.	Management Unit	Palm Oil Mill	FFB Supplying Estates owned by SDPSB
1.	SOU 28	Binuang Oil Mill	Binuang Estate, Tingkayu Estate, Sungang Estate
2.	SOU 29	Giram Oil Mill	Giram Estate
3.	SOU 30	Merotai Oil Mill	Merotai Estate, Tiger Estate, Table Estate, Imam Estate
4.	SOU 30b	Mostyn Oil Mill	Mostyn Estate

1.2 National Interpretation used for the assessment

The certification assessment of all SOUs was made against the Malaysia National Interpretation (MYNI: 2008) of the RSPO Principles & Criteria.

1.3 Scope of certification

The assessment covered four management units namely SOU 28-Binuang, SOU 29-Giram, SOU 30-Merotai and SOU 30b-Mostyn and their supply bases as mentioned in Table 1.0. The supply bases assessed were confined to estates owned by SDPSB excluding Jeleta Bumi Estate.

1.4 Location of mill and estates

SOU 28, SOU 29 and SOU 30b are located in Kunak District while SOU 30 is located in Tawau District, Sabah, East Malaysia. The locations of the SOUs are shown in Attachment 1a & 1b.

Table 2: Location and addresses of mills and estates

SOU	Estate/Mill	GPS Location		Location Address
		Latitude	Longitude	
SOU 28	Binuang Estate	4°25' N	118 °26' E	91207 Kunak, Sabah
	Sungang Estate	4°39' N	118°07' E	91209 Kunak, Sabah
	Tingkayu Estate	4°24' N	118°30' E	91207 Kunak, Sabah
	Binuang Oil Mill	4°42'15" N	118°03'37" E	91207 Kunak, Sabah
SOU 29	Giram Estate	4°35' N	118 °12' E	91207 Kunak, Sabah
	Giram Oil Mill	4°35'60" N	118°12'0" E	91207 Kunak, Sabah
SOU 30	Merotai Estate	4°23' N	117°47' E	91007 Tawau, Sabah
	Tiger Estate	4°25' N	117°50' E	91007 Tawau, Sabah
	Table Estate	4°22' N	117°52' E	91007 Tawau, Sabah
	Imam Estate	4°20' N	117°50' E	91007 Tawau, Sabah
	Merotai Oil Mill	4°37' N	117°83' E	91007 Tawau, Sabah
SOU 30b	Mostyn Estate	4°39' N	118 °07' E	91207 Kunak, Sabah
	Sungang Estate	4°35'2" N	118°11'40" E	91207 Kunak, Sabah

1.5 Description of supply base

The FFB is sourced from company-owned estates that were covered in this certification assessment, Jeleta Bumi Estate (which has yet to undergo RSPO certification) and smallholders crops. Details of the FFB contribution from each source to each SOUs is shown in Attachment 2.

1.6 Date of plantings and replanting cycles

Generally, all estates assessed are in the second generation of their planting cycle. The date of planting and age profiles for each SOUs are detailed in Attachment 3.

1.7 Other certifications held (ISO 9001:2000, ISO 14001:2004, OHSAS 18001:1999)

Although not all the operating units have third-part certification, SDPSB is implementing an integrated quality, environmental and occupational health and safety management system which is based on the requirements of the ISO 9001:2000, ISO 14001:2004 & OHSAS 18001:1999 standards.

However, some of the SOUs hold third-party certification as detailed in the flowing table:

Table 3: Other certifications held by the mill and estates

Estate and Mill		Other certification held
SOU 28	Binuang Estate	Nil
	Sungang Estate	Nil
	Tingkayu Estate	Nil
	Binuang Oil Mill	ISO 9001:2000
SOU 29	Giram Estate	OHSAS 18001, MS 1722 Part 1, ISO 14001, ISO 9001
	Giram Oil Mill	OHSAS 18001, MS 1722 Part 1, ISO 14001, ISO 9001, HACCP 1480
SOU 30	Merotai Estate	Nil
	Tiger Estate	Nil
	Table Estate	Nil
	Imam Estate	Nil
	Merotai Oil Mill	Nil
SOU 30b	Mostyn Estate	Nil
	Mostyn Oil Mill	ISO 9001:2000

1.8 Organisational information / contact person

The details of the contact person for each SOU are as follows:

Mr. G. Chandran
Chairman of **SOU 28**,
(Binuang Estate Manager)
Sime Darby Plantation Sdn Bhd
91207 Kunak, Sabah.
Malaysia
Phone : 60 89 821197
Fax : 60 89 821197

Mr. Abdullah Saminan
Chairman of **SOU 29**
(Giram Estate Senior Manager)
Sime Darby Plantation Sdn. Bhd.
91207 Kunak, Sabah,
Malaysia
Phone : 60 89 826290
Fax : 60 89 826291

Mr. Mohd Zambri Pardi
Chairman of **SOU 30**
(Merotai Estate Manager)
Sime Darby Plantation Sdn. Bhd.
91007 Tawau, Sabah
Malaysia.
Phone: 089-902801/920085
Fax: 089-902843

Contact person:

Mr. Muhamad Saipul'ilah Che Idris
Chairman of SOU 30B
(Mostyn Estate Senior Manager)
Sime Darby Plantation Sdn Bhd
91207 Kunak, Sabah.
Malaysia.
Phone: 60 89 851244 / 204
Fax: 60 89 8510181

1.9 Time bound plan for certification of other Management Units (SOUs) and justifications

Sime Darby Plantation Sdn. Bhd. owns sixty five palm oil mills and two hundred and eight oil palm estates. The mills and the estates are located in Peninsular Malaysia, Sabah & Sarawak in Malaysia and in Kalimantan, Sumatera & Sulawesi in Indonesia.

Sime Darby Plantation Sdn. Bhd is committed to RSPO certification of all its sixty-five Management Units by December 2011. The plan is detailed in Attachment 4.

Given the number of management units to be certified, the deadline for the completion of the exercise is challenging. However, it was evident during the course of the assessment that the management team was committed to meeting the target that had been set.

1.10 Area of plantation

The area of planted palms (total and mature) for all the estates assessed is detailed in Attachment 3.

1.11 Approximate tonnages offered for certification (CPO and PK)

The approximate annual tonnage of CPO and PK produced and claimed for certification are as follows:

Table 4a: SOU28 - Approximate annual tonnage produced and tonnage claimed for certification

FFB Processed (tonne)	CPO Production (tonne)	PK Production (tonne)	% of FFB from third parties	CPO Tonnage claimed for certification: (tonne)	PK Tonnage claimed for certification: (tonne)
160 476.91	34 884.10	8541.00	7.71%	32 194.54	7 882.49

It is to be noted that the contribution of FFB from two other company owned estates (Mostyn Estate and Giram Estate) have been taken into account for the purpose of calculating the tonnage of CPO and PK claimed for certification. Mostyn Estate is a part of SOU 30b and Giram Estate is a part of SOU 29. Both these SOUs have also been assessed by SIRIM QAS International and included this recommendation for certification.

Table 4b: SOU29 - Approximate annual tonnage produced and tonnage claimed for certification

FFB Processed (tonne)	CPO Production (tonne)	PK Production (tonne)	% of FFB from third parties	CPO Tonnage claimed for certification: (tonne)	PK Tonnage claimed for certification: (tonne)
161 280.18	34 996.26	7 777.52	24.94%	26 268.19	5 574.89

It is to be noted that the contribution of FFB from two other company-owned estates (Mostyn Estate and Sungang Estate) have been taken into account for the purpose of calculating the tonnage of CPO and PK claimed for certification. Mostyn Estate is a part of SOU 30b and Sungang Estate is a part of SOU 28. Both these SOUs have also been assessed by SIRIM QAS International and included in this recommendation for certification.

Table 4c: SOU30 - Approximate annual tonnage produced and tonnage claimed for certification

FFB Processed (tonne)	CPO Production (tonne)	PK Production (tonne)	% of FFB from third parties	CPO Tonnage claimed for certification: (tonne)	PK Tonnage claimed for certification: (tonne)
440691.52	65372.903	12178.396	24.76%	49186.57	9163.03

Major FFB contributions for Merotai oil mill are from the estates within this SOU (Merotai, Table, Tiger and Imam Estates).

Table 4d: SOU30b - Approximate annual tonnage produced and tonnage claimed for certification

FFB Processed (tonne)	CPO Production (tonne)	PK Production (tonne)	% of FFB from third parties	CPO Tonnage claimed for certification: (tonne)	PK Tonnage claimed for certification: (tonne)
154 411.74	33 357.00	6 678.00	32.00%	22 682.76	4 541.04

Major FFB contributions for Merotai oil mill are from the estates within this SOU.

1.12 Date of issue of certificate and scope of certification

The date of issue of certificate will be the date of the RSPO approval which is 16 January 2009.

The certification for SOU Binuang (SOU 28) covers production from Binuang Oil Mill with FFB supplied by the following company owned estates: Binuang, Tingkayu and Sungang Estate.

As for SOU Giram (SOU 29), the certification covers production from Giram Oil Mill with FFB supplied from company owned estates; i.e. Giram Estate.

The certification for SOU Merotai (SOU 30) covers production from Merotai Oil Mill with FFB supplied by the following company owned estates: Merotai, Table, Tiger and Imam Estate.

The certification for SOU Mostyn (SOU 30b) covers production from Mostyn Oil Mill with FFB supplied by the company owned estates; i.e. Mostyn Estate.

2.0 Assessment Process

2.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the oldest and leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS), the International Automotive Task Force (IATF), and the Secretariat of the United Nations Framework Convention for Climate Change (UNFCCC). SIRIM QAS International is a partner of IQNet, a network currently comprising of 36 leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting other assessments which are similar in nature to RSPO assessments. We have certified more than a hundred palm oil mills and several estates to ISO 9001, ISO 14001 & OHSAS 18001. We have also conducted several pre assessments against RSPO P&C.

SIRIM QAS International was approved as a RSPO certification body on 21st March 2008.

2.2 Assessment methodology

The assessment covered all estates under the four SOUs owned by Sime Darby Plantation Sdn. Bhd. supplying to the respective mills. Hence, the sampling formula of $0.8 \sqrt{y}$ was not used for determination of estates to be assessed for certification. However, sampling was done for activities within the estates.

The assessment was conducted by visiting the fields, HCV habitats, labour lines, storage areas and other workplaces. Interviews with the management personnel, employees, contractors and other relevant stakeholders were also conducted. Interviews, particularly those with employees, local communities and suppliers were conducted formally as well as informally, without the presence of company management personnel. Apart from that, records as well as other related documentation were also evaluated.

The initial programme for the assessment is in Attachment 5. Based on a request made by the organization during the assessment and taking into consideration the fact that most of the documents used are the same for all four SOUs, the assessment programme was amended as detailed in Attachment 6.

2.3 Qualifications of the lead assessor and assessment team

The qualifications of the lead assessor and assessment team members are as detailed in Attachment 7.

2.4 Outline of how stakeholder consultation was managed

Stakeholder consultation was initiated with the announcement in the RSPO web site and SIRIM QAS International web site on 21st March 2008. Apart from that, letters were also sent to relevant stakeholders including government agencies and NGOs.

A few enquiries were received through the telephone prior to the main assessment and these were responded to. One written feedback was received from Jabatan Tenaga Kerja Sabah. The department indicated that it did not have any issue with the organization.

During the main assessment, stakeholder consultations were also conducted involving employees, government agencies, non-governmental organizations, local communities and other interested parties in the form of meetings and interviews. Following is the list of common stakeholders contacted for all the SOUs:

Government Agencies

1. Department of Occupational Safety & Health (DOSH), Kota Kinabalu, Sabah.
2. Sabah Environmental Protection Department, Kota Kinabalu, Sabah.
3. Department of Environment (DOE) (Negeri Sabah), Kota Kinabalu, Sabah.
4. Social Security Organization (SOCSO), Tawau, Sabah.
5. Labour Department, Tawau, Sabah.
6. Immigration Department, Tawau, Sabah
7. Malaysian Palm Oil Board (MPOB), Sabah Region, Kota Kinabalu, Sabah.
8. Forestry Department, Sandakan, Sabah.
9. Bukit Tawau National Park, Tawau, Sabah.
10. Tawau District Forest Officer

Non-Governmental Organizations

1. Borneo Conservation Trust, Kota Kinabalu, Sabah.
2. Sabah Environmental Protection Association (SEPA), Kota Kinabalu, Sabah.
3. Consumers' Association of Sabah & Labuan, Kota Kinabalu, Sabah.
4. Sahabat Alam Malaysia, Pulau Pinang
5. Women's Aid Organization, Kuala Lumpur.
6. World Wide Fund for Nature Malaysian, Petaling Jaya, Selangor.
7. Wetlands International (Malaysia) Petaling Jaya, Selangor.
8. Environmental Protection Society Malaysia (ESPM), Petaling Jaya, Selangor.

Local Communities & Other interested parties

1. Tn. Hj. Munadi Bakri, Chairman of Sabah Plantation Industry Employees Union (SPIEU) and Merotai SPIEU representative.

2. Ms. Jawaria Sima @ Murni, Secretary General of SPIEU.
3. Mr. Amsah Pawakai, Chairman of SPIEU for Mostyn and Tingkayu Estate.
4. Civil contractor
5. Agri-Horticultural contractor
6. FFB supplier
7. Provision shop operator
8. Local communities' leader of Kampung Dataran, Kampung Anjung & Kampung Pedalaman, Binuang.

2.5 Date of first surveillance visit

The first surveillance audit will be conducted around May 2009, i.e. twelve months from the date of the main assessment.

3.0 Assessment Findings

3.1 Summary of findings with respect to each RSPO criterion

PRINCIPLE 1: COMMITMENT TO TRANSPARENCY

Criterion 1.1: Oil palm growers and millers provide adequate information to other stakeholder on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.

SDPSB has a procedure for responding to requests for information on issues relevant to the RSPO criteria. This procedure has been adopted and is implemented by all the SOUs.

It was evident from their records that requests and correspondences from interested parties are responded to and records maintained. Among the records sighted were correspondences with the authorities and local communities.

Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

Clause 3.2 of the Procedure on Sustainable Plantation Management System specifies that management documents will be made publicly available through annual reports, brochures as well as through the organization's website.

The web-site was not accessible during the assessment. SDPSB has since taken appropriate action to enable interested parties to access the information through the web at the following addresses:

http://plantation.simedarby.com/Sustainability_Management_Programmes.aspx,
http://plantation.simedarby.com/Boundary_Disputes.aspx,
http://plantation.simedarby.com/Land_Title.aspx

PRINCIPLE 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Criterion 2.1 : There is compliance with all applicable local, national and ratified international laws and regulations

All the SOUs assessed have a documented system for identifying and updating legal requirements and for monitoring the status of legal compliance. This document is part of the Sime Darby Plantation Estate/Mill Quality Management System documents. Among the identified legal requirements are Environmental Quality Act and Regulations, 1974, Factories and Machinery Act and Regulations, 1967, Occupational Safety and Health Act and Regulations, 1994 & Worker' Minimum Standards of Housing and Amenities Act, 1990.

It was noted that the SOUs are committed to maintaining their compliance with the legal requirements. This was verified during the on-site assessment as well as through documentation. Approval letters were sighted for relevant operations and records of monitoring activities are being maintained. Among the monitoring records verified were discharge from the effluent treatment plant and dust particulate emission from boilers and audiometric tests and health surveillance of employees. Results of the monitoring activities were submitted to the relevant authorities as required.

Nevertheless, improvement is needed in some areas. It was also noted that SOU 28 and SOU 30 have conducted replanting after the year 2005. However, Proposal for Mitigation Measures (PMM) as required by Sabah Environment Protection Enactment, Environmental Protection (Prescribed Activities) (Environmental Impact Assessment) Order 2005 was not made available to the assessment team for verification. Nonconformities were raised on these matters.

Criterion 2.2 : The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights.

All SOUs assessed have evidence of legal ownership. Copies of land titles for the estates were sighted and it was evident that the terms of the land titles were being complied with. The original ownership documents are kept at SDPSB's headquarters.

During the on-site assessment, it was noted that the SOUs had managed to locate some of the boundary stones adjacent to the forest reserves, state land and small holdings. They are also making efforts to locate all the boundary marks by engaging a licensed surveyor to ensure that there is no encroachment.

Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

All the SOUs were bought from other plantation companies namely BAL Plantation, Tongkah Holdings, Shao Land and Ladang Koko Sg. Limau by Golden Hope Plantation Sdn. Bhd. Following the merger of Golden Hope Plantation Sdn. Bhd, Kumpulan Guthrie Berhad and Sime Darby Sdn. Bhd, the SOUs are now under SDPSB.

Evidence of ownership (cross refer to section 2.2) was available. It was also noted from records sighted, as well as through interviews with stakeholders, that there were no disputes on land rights in the area.

PRINCIPLE 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Criterion 3.1 : There is an implemented management plan that aims to achieve long-term economic and financial viability.

All the SOUs assessed have a long term business plan. Annual budgets, as well as three-year and five-year plans for the estate and the mill were sighted.

The budget documents for the Financial Years 2007/2008 and 2008/2009 were sighted. The budget includes allocation for welfare and social services, such as the upgrading of workers' quarters. Allocations had also been made for improving environmental conditions and for ensuring a safer working environment.

PRINCIPLE 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

All SOUs assessed have established Standard Operating Procedures (SOP) for the Estates and the mills. These SOPs were part of the Sime Darby Plantation, Estate/Mill Quality Management System (2008), Sime Darby Plantation-Sustainable Plantation Management System (2008), Pictorial Safety Standard (PSS) and the Agricultural Reference Manual ((2007) for the estate) documents.

It was also noted that some signboards and SOPs had translations in the Bugis language as the majority of the workers were of Bugis origin. SOPs were also displayed at several locations such as at muster ground, communication notice board, supervisor's room and chemical stores.

Monitoring of the SOPs implementation were recorded and maintained. Among the monitoring records are field related activities such as the manuring and spraying programmes, rat census and agrochemicals usage.

Observation at site and interviews with employees revealed that they are aware of the procedures and understood the requirements. The implementation of the SOPs are also periodically verified by the mill advisor and plantation advisor from Sime Darby Plantation Headquarters.

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

The SOUs are monitoring their fertiliser input through the annual fertiliser recommendation provided by agronomist from SDPSB. The recommendation reports sighted - 'Agronomic & Fertilizers Recommendation Reports – Oil Palm 2007/2008' showed evidence of periodic leaf (tissue) sampling. However, there were no records of soil sampling and soil nutrient status. As such, a minor non-conformity was raised on this issue.

Nevertheless, on-site assessment and documentation review revealed that the SOUs are implementing the recommended programme. The SOUs are also applying and monitoring the empty fruit bunch (EFB) and palm oil mill effluent (POME) application at locations identified in field maps for the EFB & POME application programme as recommended. The plantation advisor's report also confirmed that the programme was being implemented as planned.

Criterion 4.3: Practices minimise and control erosion and degradation of soils.

All estates within the SOUs are implementing, in as practicable a manner as possible, the best

practices for minimizing erosion. Among the evident practices were terracing, stacking of fronds to prevent / slow down surface run off, provision of water/moisture conservation pits and the diversion of roadside water into the fields. Cover crops were planted in the field to avoid bare soil. In addition, Vertivar, Guatemala grasses and Bamboo were planted near waterways as part of the erosion control measures. Apart from that, the estates practiced only circle and paths spraying. These practices leave the interlines with soft grasses and Nephrolepis.

Road maintenance programmes such as resurfacing, grading and culvert maintenance which contribute to minimizing erosion were implemented, monitored and recorded in the costing books.

It was also noted that there are areas of more than 30° gradient that have been planted with oil palm. These areas were planted before Golden Hope Plantation Sdn. Bhd. acquired it. The new management of SDPSB has established a policy on slope protection and river buffer zone. This policy states that areas of more than 25° slope will be conserved during replanting. Another initiative sighted was the poisoning of oil palm in areas of more than 25° slope in Sungang Estate. This area is being replaced with teak. The intention is to encourage crop diversification.

Criterion 4.4 : Practices maintain the quality and availability of surface and ground water.

The SOUs are tapping water for consumption by both the mills and the estates from river and spring. It was noted that they have not constructed any bunds/weirs/dams across the main rivers and thus ensuring that there is no disturbance to the water flow and to downstream users.

However, the management of the riparian zone still needs improvement. During on-site assessment, it was noted that the SOUs were in the process of demarcating the riparian zone along the main rivers. Guidance had been established to cease any field upkeep activities within these areas and to allow natural vegetation growth. Interviews with employees revealed that they are aware of this guidance. It is also planned that for all future replanting, the 20m buffer zone for all major rivers will be implemented. This is clearly indicated in the replanting blueprint.

It was also noted that SOU 29, 30 & 30B are experiencing infestation of aquatic water weed. Hence, it is recommended that they investigate the cause of the infestation and provide supporting documents during the surveillance assessment to ensure that it was not from their activities.

All SOUs are monitoring monthly rainfall data. The records were well maintained. They are also monitoring the water consumption by the mill and water quality along identified waterways. However, a minor nonconformity was raised as there is no water management plan established with the aim of maintaining the quality and availability of water.

For SOU 30, the need to enhance their water resource management was identified as they are experiencing fluctuation in the quality of effluent discharge from the mill. There were instances where the limit exceeded the legal requirement. The mill has taken corrective action to rectify the situation. On top of that, additional budget has been approved to improve the effluent treatment plant.

It was also noted that SOU 30 has an agreement with its neighbour (Manusi Plywood) for it to tap water from their reservoir. Hence, they need to ensure that all operations by Manusi Plywood within their area do not impact the environment.

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

Integrated pest management (IPM) is widely practiced in SDPSB. They are the pioneer in introducing zero burning replanting and are among the plantation companies using barn owls in Peninsular

Malaysia. An IPM programme has been established and is documented in the Agricultural Reference Manual. The programme is being implemented by all the SOUs assessed.

Among the IPM programmes which have been implemented is the aggressive planting of beneficial plants to control leaf eating caterpillar. Its implementation is being monitored physically as well as by way of identification on a field map. The four major beneficial plants are *Turnera sp.*, *Cassia Cobanensis*, *Antigonon leptopus* and *Euphorbiaceae sp.* Apart from using beneficial plants, SOU 30 is also trying to introduce the barn owl (*Tyto Alba*) as part of its IPM initiatives.

In addition to the above-mentioned measures, the estate has also controlled *Dana trima* attack by spraying the *Granulosis* virus. However, no SOP for this activity had been established. Monitoring of *Dana trima* attack is done by way of census on mortality of infested larvae. Other census programmes for pests and diseases, such as for rats and Ganoderma, were also being conducted. All of these efforts are part of the best practices to minimize usage of chemicals in the plantation. The usage of pesticide was recorded and monitored as required by the MYNI indicators.

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives, and this is documented.

All the SOUs assessed were using agrochemicals that had been registered under the Pesticide Act 1974. Agrochemicals categorized as World Health Organization Type 1A or 1B and those listed by the Stockholm or Rotterdam Convention were not being used in the estates. It was also confirmed that Paraquat was not being used.

Written justification of all agrochemicals used in the estate is available in the Agriculture Reference Manual (ARM), SOPs and Pictorial Safety Standard (PSS). These documentation include a chemical register list which indicates the purpose of chemical usage (intended target), hazards signage, trade and generic names. The PSS are used as a means of communication to the employees during training and briefing sessions.

The use and storage of agrochemicals including pesticides was observed to be in accordance with Pesticide Act 1974, Occupational Safety & Health Act 1994 as well as USECHH Regulations 2000. Empty chemical containers are triple rinsed and stored for disposal in accordance with legal requirements. Apart from the above, records of the purchase, storage and use of agrochemicals were found to be properly maintained.

Interview with chemical handlers and on-site observation in the field and in the chemical stores confirmed that they understood the requirements for proper chemical handling. It was also noted that the SOUs have secondary containment, spill trap, labelling and emergency water shower as part of the facilities provided for preparedness in the event of any abnormal and emergency situation. MSDS were available and displayed at points of use.

Based on the CHRA assessment recommendation, medical surveillance has been conducted on employees such as estate sprayers and mill laboratory operators due to their exposure to chemicals in the course of carrying out their jobs. Pregnant and breast-feeding women are not allowed to work with pesticides.

Assessment of the SOUs records revealed that there was no request from buyers to test for chemical residue in CPO. It was noted however that the mill had taken proactive action by carrying out such tests. It was also noted that the SOUs do not practice aerial application of agrochemicals.

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented

The SOUs have established and implemented an Occupational Safety & Health (OSH) Management System as part of their integrated management system. An OSH policy has been established and it was evident that this had been communicated to the employees and interested parties. The policy was translated into Bahasa Malaysia and displayed on the communication notice board at several strategic locations.

The hazard identification, risk assessment and risk control (HIRARC) had been carried out covering all activities in the estate and mill as well as supporting facilities such as the workshop, the effluent and water treatment plants, chemical and waste storage and the laboratory. Based on the risk assessment, it was noted that the SOUs had determined and were implementing appropriate risk control measures.

Evidence of OSH implementation was observed during the field and mill assessment where all employees had been provided with and were seen to be using the appropriate PPE. Interview with members of the Safety Committee and review of records confirmed regular safety meetings and workplace inspection had been carried out. It was also noted that training on first aid, emergency procedures and chemical handling for supervisors, mandores and workers had been conducted and training records were maintained.

The SOUs have also appointed the Mill Engineers and Assistant Estate Managers as the persons responsible for the implementation of OSH Management System. Safety performance was being monitored and accident cases were managed in accordance with OSH Regulations. The workers for each SOU are all covered by accident insurance.

Criteria 4.8: All staff, workers, smallholders and contractors are appropriately trained.

The SOUs assessed have established a generic process for the identification of training needs which focuses mainly on the job and safety related issues. It is a process that should be improved. A nonconformity was raised as the existing process does not ensure that the appropriate level of training is given to the relevant personnel to enhance competency.

PRINCIPLE 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

The SOUs have conducted the environmental aspects and impacts assessment for all activities related to estate and mill operations, as well as other facilities such as the workshop, chemical and waste storage, the effluent and water treatment plants and the laboratory. It was observed that assessment records are periodically reviewed when there are any changes to their activities. The significant environmental aspects and impacts had been identified and an improvement plan had been developed for mitigating the significant adverse impacts. The on-site assessment confirmed that the improvement plans were being implemented.

Criterion 5.2: The status of rare, threatened or endangered species (ERTs) and high conservation value habitats, if any, that exists in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

A preliminary biodiversity assessment for all the SOUs was conducted by researchers from the Institute for Tropical Biology and Conservation, University Malaysia Sabah. The assessment reports on the presence of insects, birds, fish, small mammals, butterflies & herpetofauna (frogs, snakes & lizards) only. It is noted that this is the first step in identifying and assessing HCV habitats and protected areas within the land holdings and the nearby forest reserves.

During the visits to the estates, particularly along the river riparian zone between the Binuang and Tingkayu Estates, endangered species such as the proboscis monkey and the hornbill were noted. The presence of these species was not reported in the assessment report. Birds observed throughout the SOUs included Pied Hornbills, White-bellied Sea Eagles and Black-shouldered Kites. It was therefore obvious that there was a need for a more comprehensive assessment.

Interviews with employees revealed that they had encountered other animals such as deer, wild oxen, sun bears and orang utans. However, records of these sightings were not kept except for intrusion by elephants.

On a positive note, it was observed that the SOUs had also taken the initiative to identify the HCV areas within the estates. The identified HCVs are as follows:

- SOU 28 - mud pool in Binuang Estate, hot springs in Sungang Estate,
- SOU 29 - springs that are meant as water catchment areas, the rapids for recreation purposes
- SOU 30 - the Tualang tree (*Koompassia excelsa*) that is recognized as the tallest in the world for Koompassia species, Tiger Hill where the highest point exceeded 400m above mean sea level, and the cocoa germ plaza which has four hundred and fifty one types of cocoa clones.
- SOU 30B - springs that are meant as water catchment areas, the ex-Japanese war tunnel,

Despite the attempts made to identify the HCV habitats and ERTs and other actions taken, there was a concern that no clear management plan had been established. A major non-conformity was raised on this issue.

There was other evidence, however, to demonstrate that the SOUs are committed to the conservation of the habitat. Signages to prohibit illegal hunting of wildlife were clearly displayed at the entrance and within the plantations. Elephants' intrusion into the area is mitigated by the erection of high voltage fencing along the forest border.

Consultation with the Bukit Tawau National Park Ranger (adjacent to SOU 30) revealed that they had no complaints against the SOU. It was indicated that they receive cooperation in their efforts to curb illegal hunting.

Criterion 5.3: Waste is reduced, recycled, re-used and disposed off in an environmentally and socially responsible manner.

The SOUs have established a waste management plan that covers general, solid, liquid and scheduled wastes. General wastes are collected from the labour lines and disposed by burying within the plantation. No permanent site had been allocated for the disposal of waste. The disposal pit is temporary and will be closed once filled. During the on-site assessment, it was observed that the current waste disposal site, which is located in a low lying area, was generating a lot of leachate due to water ponding. A non-conformity was raised on this matter.

On a positive note, it was evident that of crop residue / biomass were being recycled. Among the practices noted were EFB mulching and POME application in the estate and the use of fibre and shells as fuel in the mill boilers. Scrap metal was stored in a designated area and collected by a recycler. Scheduled wastes were being managed in accordance with regulations.

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximized.

The SOUs are committed to using renewable energy in the mill. Palm fibre and shell are used to fuel the boiler and generate steam for the process as well as electricity for the mill operation and line site. Fossil fuel is used to operate diesel engine generator sets, which are on stand-by to support the operations in the event of a mill breakdown. Assessment has verified that Operation Data-April 2008 recorded the efficiency of energy consumption per tonne of CPO produce.

Records of monitoring of the use of both renewable energy and fossil fuels were available.

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN Guidance or other regional best practice.

The SOUs are implementing the Sime Darby Plantation zero burning policy. This practice has been adopted company-wide since 1989. The palm trees are felled, chipped/shredded and windrowed within the plantation during planting/replanting.

Site assessment throughout the SOUs confirmed that there were no traces of open burning.

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

All the SOUs have established 'Pollution reduction action plan 2007/2008' which describes the significant environmental impacts, action to be taken, person in charge and time frame for its implementation. The implementation is recorded in the Environment Management Programme for financial year 2007/2008 – MR-03/QSHEP form.

On-site assessment verified that the implementation of the action plan. This included the reduction of effluent discharge by optimizing mill water consumption and the phasing out estate vehicles which had been identified as having high emission of black smoke and high fuel consumption were done in accordance to the schedule. Monitoring records are available and it was noted that the action plans are reviewed during the operations meeting.

PRINCIPLE 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES AFFECTED BY GROWERS AND MILLS

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

A consultant had been appointed to conduct the Social Impact Assessment (SIA). During the main assessment, it was noted that the consultant's team was also conducting a survey as input to the SIA for the four SOUs in Kunak and Tawau Region. Two nonconformities (one major and one minor) were raised due to the absence of evidence of a documented SIA. As a consequence of this, it was not possible to verify whether the assessment had been conducted with participation of all the affected parties and no plans had been established to mitigate any possible negative impacts.

Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

The SOUs have a documented procedure for consultation and communication that was established as a part of the Sime Darby Plantation Estate Quality Management System and Mill Quality Management System. Consultation and communication relating to social and land matters are covered in specific procedures relating to these subjects.

Records of communications and consultation stakeholders were sighted and depending on its nature, an issue or a grievance is handled by the manager or referred to the Regional Office Tawau (ROT) for decision. Interviews with local communities and employees as well as sighted communication correspondence found the practice to be satisfactory. Among the communication records are correspondence with various government agencies and representatives from the Sabah Plantation Industry Employees Union (SPIEU). It was felt that the list of stakeholders maintained by SOU 29 for the purpose of consultation and communication should be expanded to include other local communities, authorities and other interested parties.

Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

All the SOUs assessed have a documented system for dealing with complaints and grievances for any affected parties. Assessment of their records revealed that complaints and grievances were resolved in an appropriate manner. Records relating to the receipt, handling and disposition of complaints were appropriately identified and maintained. Among the records sighted were files on customers' complaints and records of corrective actions taken. Records relating to handling of grievances were documented in minutes of meetings.

The SOUs have also recently introduced a mechanism for addressing complaints from employees relating to facilities and other issues. Suggestion boxes had also been introduced for internal communication. Effectiveness of the implementation of these mechanisms will have to be verified during subsequent assessments.

Criterion 6.4: Any negotiations concerning compensation for loss of legal or customary 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.

The SOUs were purchased from other plantation companies (refer to section 2.2 & 2.3). Ownership was then transferred to Sime Darby Plantation Sdn Bhd following the merger of the three plantation companies (Golden Hope, Sime Darby and Kumpulan Guthrie).

It was verified during the assessment that there was no record of land disputes or claims for compensation. This was confirmed during interviews with neighbouring communities.

Criterion 6.5: Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

The pay and conditions of employment for all the SOUs assessed are documented in the Collective Agreement (CA) (2005-2007). The agreement was between SPIEU and Golden Hope Plantation Sdn. Bhd.

However, a nonconformity was raised because at the time of the assessment, the Labour Ordinance

and CA were not available in a language understood by the employees. It was also confirmed during interviews with employees that they were generally aware of many of the provisions of the agreement, especially those relating to pay and conditions of employment. However, there were also many provisions which they were not aware of, as the contents of these documents were not explained carefully to them by the management.

Interviews with employees of contractors revealed that they were aware of the terms and conditions of their employment e.g. pay, working hours and entitlement for payment for working overtime and during public holidays.

The SOUs have provided houses and amenities to their employees. New houses are being constructed in phases to replace those built earlier. Houses and water supply are provided free of charge. However, there is a minimum charge for electricity. Water supply and electricity were provided for a limited number of hours in a day.

During consultation with employees, some of them (SOU 28 & SOU 30B) complained of low water pressure and quality of water supplied to the houses as well as interruptions in electricity supply. Assurances were given by the management of all the SOUs that these will improve in the years to come as the housing replacement process is ongoing.

The SOUs also provide other facilities within their area such as a clinic manned by a hospital assistant and visited by a visiting medical officer twice a month. Other facilities available are primary schools, classes for Muslim children (i.e. KAFA – *Kelas Agama Fardu Ain*), crèches, and schools intended specifically for children of migrant workers (HUMANA schools). Sundry shops were also provided within the labour lines.

Criterion 6.6: The employer respects the right 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.

The SOUs allows its employees the right to freedom of association. A minor nonconformity against indicator 6.6.2 was raised because there was no published statement in any of the local languages recognizing the freedom of association. The Sabah Plantation Industries Employees Union (SPIEU) is active in the area and has been representing the employees in their negotiations for the Collective Agreement with the management of SDPSB.

Minutes of meetings between SPIEU and the management were also available. Records of correspondence between the union and the company management were also sighted. Among the employee-related issues highlighted were benefits, use of estate facilities and other matters relating to the working environment. It was evident from these records that the management has been responsive to the union's concerns and needs.

The SOUs allow their employees to join the Sabah Plantation Industry Employees Union (SPIEU) to bargain collectively. Meetings are called only when issues raised by members need to be discussed. When meetings are held, minutes are recorded and maintained.

There are also records of correspondence between the union and the estates relating to employee matters (e.g. benefits, joint meetings, use of estate facilities and other matters relating to the working environment). It appears that the estates have been responsive to union concerns and needs. It was also noted that there were other channels for employees, including the non-unionised employees, to highlight issues of concern to the management. One such avenue is the QCS meeting. It is attended by staff and workers. Records sighted showed that discussions at these meetings included labour issues such as requests for provision of uniforms and improvement of company-provided facilities.

Criterion 6.7: Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision, and when not interfering with education programmes. Children are not exposed to hazardous working conditions.

SDPSB has a policy on not employing children both in the estate and the mill. The established policy is posted on the notice board and explained to the workers.

Assessment on the SOUs employees' employment record revealed that the policy is strictly followed. The records showed that the minimum age of workers is 19 years old. Interview with workers revealed that they are aware of this requirement.

Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.

The SOUs have adopted the SDPSB 'Social Policy' established in April 2008. This policy addressed non-discrimination on the basis of race, caste, national origin, religion, disability, gender, sexual orientation, union membership and political affiliation. The policy is displayed on notice boards as the main means of communication. It was translated to languages understood by the workers and briefings were also conducted.

It was evident that the SOUs are implementing this policy. Verification of records of employment showed that the same terms of employment were given to employees performing the same category of work regardless of race, sex or national origin. Interviews with employees also confirmed that they did not experience any form of discrimination.

Criterion 6.9: A policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

A policy to prevent sexual harassment, violence against women and protection of women's reproductive rights has been established at SDPSB's level. To support the policy implementation, SDPSB in consultation with Tenaganita, is in the process of establishing the grievance mechanism for this matter. However, at the point of main assessment, the specific grievance mechanism had yet to be completed. A nonconformity was raised for this issue. In the interim, the company's general grievance procedure is used for dealing with these issues.

Through interviews with female employees, it was found that there were no issues of sexual harassment or violence against women. It was also evident that the SOUs supported the protection of female reproductive rights. Female employees were entitled to paid maternity leave and expectant mothers were assigned light work.

Criterion 6.10 : Growers and mills deal fairly and transparently with smallholders and other local businesses.

The SOUs have agreements with all smallholders supplying FFB to them. The agreements clearly stipulate the rates of payment for the FFB, which are based on MPOB published prices. The prevailing MPOB prices are displayed on a daily basis.

It was evident from records sighted that the amount paid to smallholders were strictly in accordance with the agreements. It was also verified through records that payments were made within the period agreed to with the supplier. In some cases, this was done once in a month whilst in other cases, suppliers were paid twice in a month. Interviews with the suppliers revealed that they had no

complaints on their dealings with the SOUs.

Other local business partners such as a civil engineering contractor, agri-horticulture contractor and groceries shop owners indicated that they were generally satisfied with their dealings.

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

The SOUs are committed to local sustainable development. They have contributed to it by providing employment opportunities. Apart from that, roads that are used by the local communities and within the estates jurisdiction are maintained for easy access.

Based on consultation with the local communities, it was found that the SOUs also contributed to the needs of the local school and also towards public / community facilities, such as the upgrading of surau and temple.

Interviews with the local communities revealed that they are happy with the contribution from the SOUs.

PRINCIPLE 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

The SOUs have adopted the company's policies and procedures on new plantings. These are clearly stated in their documentation. However, at this point in time, the implementation of this policy was not assessed as there were no new plantings.

PRINCIPLE 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Criterion 8.1 : Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

Generally, the SOUs have established continuous improvement plans for all the indicators except for indicator 8.1.5 (refer to C6.1). Most of the plans are implemented through the internal integrated management system requirements.

Among evidences seen were the commitments to minimize the use of certain pesticide by implementing IPM. On-site verification of records in the chemical stores, interviews with workers, chemical inventory records and purchase orders confirmed that no agrochemicals categorized as World Health Organization Type 1A or 1B and Paraquat were being used in the estates. It was also noted that the chemicals purchased were justified. In addition, IPM practises such as the establishment of beneficial plants, the planting of cover crops in immature fields rather than using weedicide for field upkeep and the reintroduction of barn owls will contribute to the reduction of chemical consumption..

As for waste management, waste from by-products such as empty fruit bunches (EFB) and palm oil mill effluent (POME) was converted into compost as part of the commitment to zero waste. The SOUs are also practicing recycling.

Apart from that, allocations were seen provided to rectify or improve environmental and social conditions. Among the improvement plans implemented are the reduction of effluent discharge, improving the condition of estate workshop and scheduled waste stores, replacement of new housing

and establishment of HUMANA schools. All expenditure incurred in relation to improving the social and environmental aspects were recorded.

3.2 Nonconformities, Corrective Actions and Auditors Conclusions

Details of the nonconformities, corrective actions taken and auditor verification of the actions taken are in attachment 8. The SOUs have responded to all the nonconformities. All nonconformities have been closed out following verification of the corrective actions taken.

3.3 Noteworthy Positive Components

The management of SDPSB and all the SOUs are committed to their pledge on producing sustainable palm oil. This was evident throughout the assessment as employees at all levels were aware of the company's mission.

Apart from that, the implementation of their internal integrated system which is based on the requirements of the ISO 9001, ISO 14001 & OHSAS 18001 standards, has resulted in the culture of seeking continual improvement.

3.4 Issues raised by stakeholders and the findings of the assessment team

Consultation with stakeholders revealed that most of the comments were positive and need no further action. Among the comments highlighted are the good cooperation from the SOUs with the local communities and their other neighbour (Bukit Tawau National Park) whenever their assistance was sought.

However, there were two comments that were brought to the team's attention that needed to be addressed. The first comment was from the employees with regards to the housing and other facilities. It was noted that the houses that were some years ago need continual maintenance. Apart from that, the water supply was also intermittent due to low water pressure and period for electricity supply was short. Consultation with the SOUs revealed that they are aware of these issues. The replacement of the housing and upgrading of the facilities were budgeted for every year and as such is on-going. As for the electricity supply, the SOUs have allocated the supply hours based on when it is most needed such as during preparation for work/school in the morning and during the rest period in the evening. It was noted from records assessed that whenever there were requests for extended hours of electricity supply for functions/ceremonies in the line site, these had been fulfilled by the SOUs.

The second comment was from the Sabah Environment Protection Department on the failure to submit PMM for replanting. The related SOUs (Binuang and Merotai) have taken the appropriate action as required by the authority.

NOTE: Abbreviation used

Abbreviations Used

CPO	Crude Palm Oil
PK	Palm Kernel
FFB	Fresh Fruit Bunch
MYNI	Malaysia National Interpretation
RSPO	Roundtable on Sustainable Palm Oil
SOU	Strategic Operating Unit
SDPSB	Sime Darby Plantation Sdn. Bhd.
GPS	Global Positioning System
UKAS	United Kingdom Accreditation Services
IATF	International Automotive Task Force
UNFCCC	United Nations Framework Convention for Climate Change
HCV	High Conservation Value
NGOs	Non Government Organisations
DOSH	Department of Occupational Safety and Health
DOE	Department of Environment
SOCISO	Social Security Organisation
MPOB	Malaysia Palm Oil Board
SEPA	Sabah Environmental Protection Association
ESPM	Environmental Protection Society Malaysia
SPIEU	Sabah Plantation Industry Employees Union
PMM	Proposal for Mitigation Measures
SOP	Standard Operating Procedure
PPE	Personnel Protective Equipment
EFB	Empty Fruit Bunch
SDM	Smoke Density Meter
IPM	Integrated Pest Management
ARM	Agricultural Reference Manual
USECHH	Use and Standard of Exposure of Chemicals Hazardous to Health
CHRA	Chemical Health Risk Assessment
MRL	Maximum Residue Limit
HIRARC	Hazard Identification, Risk Assessment and Risk Control
OSH	Occupational Safety and Health
DOSH	Department of Occupational Safety and Health
TNI	Training Need Identification
ERT	Endangered, Rare and Threatened Species
POME	Palm Oil Mill Effluent
SIA	Social Impact Assessment
CA	Collective Agreement
BAL	Borneo Abaca Limited
KAFA	Kelas Agama dan Fardhu Ain

3.5 Certified organization's acknowledgement of internal responsibility

I, the undersigned, representing SOU 28, SOU 29, SOU 30 & SOU 30B, acknowledge and confirm the contents of the assessment report and findings of the assessment.

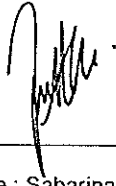


Date : 14 Jan 09

Name : ZUHAIRI ZUBIN

3.6 Formal sign-off of assessment findings

I, the undersigned on behalf of SIRIM QAS International Sdn. Bhd. confirm the contents of the assessment report and findings of the assessment.



Date : 14 Jan 09

Name : Sabarinah Marzuki