



**PUBLIC SUMMARY
FOURTH SURVEILLANCE ASSESSMENT**

**PPB OIL PALMS BERHAD
RIBUBONUS CERTIFICATION UNIT**

Sandakan, Sabah, Malaysia

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TABLE OF CONTENTS		Page
	SUMMARY	3
1.0	SCOPE OF CERTIFICATION	3
1.1	National Interpretation Used	3
1.2	Certification Scope	3
1.3	Location of Mill and Supply Base	3
1.4	Description of Supply Base (Fruit Sources)	4
1.5	Date of Planting and Cycle (Planted Area)	4
1.6	Other Certifications Held	5
1.7	Organisational Information/Contact Person(s)	5
1.8	Time Bound Plan for Other Management Units	5
1.9	Area of Plantation	5
1.10	Approximate Tonnage Offered for Certification	5
1.11	Progress of Associated Smallholders or Outgrowers towards Compliance with Relevant Standards	6
1.12	Certification Details	7
2.0	ASSESSMENT PROCESS	7
2.1	Certification Body	7
2.2	Qualification of Lead Assessor and Assessment Team	7
2.3	Assessment Methodology and Programme	8
2.4	Stakeholder Consultation and List of Stakeholders Contacted	8
2.5	Date of Next Surveillance Visit	8
3.0	ASSESSMENT FINDINGS	9
3.1	Summary of Findings	9
3.2	Identified Non-Conformities	49
3.3	Status of Non-conformities Previously Identified	49
3.4	Issues Raised by Stakeholders	49
3.5	Noteworthy Positive and Negative Observation	49
4.0	CERTIFIED ORGANIZATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY	49

List of Attachment

		Page
Attachment 1	: Location map of Ribubonus CU	50
Attachment 2	: Assessment Programme	51
Attachment 3	: Detail of Non-conformities and Corrective Actions Taken	55
Attachment 4	: Status of Non-Conformities Previously Identified	57

SUMMARY

This public certification summary provides the general information on the Ribubonus Certification Unit (Ribubonus CU) of the PPB Oil Palms Berhad (PPB), the assessment process, the findings of the surveillance, Non-Conformity Reports (NCRs), verification of corrective actions on the NCRs raised during the previous surveillance as well as the decision on the continued certification of the CU against the requirements of the RSPO Principles & Criteria for Sustainable Palm Oil Production, Malaysian National Interpretation Working Group (MY-NI) :2010.

The fourth surveillance assessment on the Ribubonus CU was conducted on 27-29 August 2014. SIRIM QAS International Sdn Bhd (SIRIM QAS International) was contracted by PPB to conduct this surveillance assessment. SIRIM QAS International is the leading testing, inspection and certification body (CB) in Malaysia having provided its services to all sectors of the business and industry for over 30 years. SIRIM QAS International, as an accredited CB by the United Kingdom Accreditation Service (UKAS) and STANDARDS MALAYSIA provides a comprehensive range of management system certification services on quality, environment, and health and safety.

SIRIM QAS International has wide experience in conducting assessments on palm oil mills and oil palm estates for certification of management system against the requirements of the ISO 14001 and OHSAS 18001. SIRIM QAS International was approved as a CB by RSPO on 21 March 2008. Since then, it has conducted many assessments on RSPO sustainable production of palm oil in Malaysia.

This surveillance assessment on the Ribubonus CU has resulted in the issuance of one (1) major and two (2) minor Non-Conformity Reports (NCRs). The Ribubonus CU has taken corrective actions to address the major NCR which have been verified by the assessor and therefore closed out. The Ribubonus CU has also submitted a corrective action plan to address the minor NCRs which has been reviewed and accepted by the assessor. The verification on these corrective actions would be under taken by SIRIM QAS International during the next surveillance audit.

Based on the findings of this surveillance, it could be concluded that the Ribubonus CU has continued to comply with the requirements of the RSPO MY-NI: 2010. The one major NCR raised during this surveillance assessment has been adequately addressed and therefore closed out. The assessment team therefore recommends the Ribubonus CU to maintain its certification against the RSPO MY-NI: 2010.

1.0 SCOPE OF ASSESSMENT

1.1 National Interpretation Used

The operations of the Ribubonus Palm Oil Mill (RPOM) and its supply bases of oil palm fresh fruit bunches (FFBs) were assessed against the requirements of the RSPO MYNI: 2010. For RSPO supply chain certification, the assessment on RPOM was conducted against the requirements of the Mass Balance (MB) module of the RSPO Supply Chain Standard, November 2011.

1.2 Certification Scope

The certification unit (CU) assessed in this surveillance was the Ribubonus CU which is a subsidiary of Sabahmas Plantations Sdn Bhd. (SPSB), a wholly owned company of PPB. Ribubonus CU consisted of RPOM and the Ribubonus Estate. The scope of certification is the sustainable production of crude palm oil and palm kernel using the Mass Balance (MB) model.

1.3 Location of Mill and Supply Base

RPOM and Ribubonus Estate are located in Sandakan District, Sabah, Malaysia. Ribubonus Estate can be accessed by using the Sandakan – Telupid Road and about 157 km from Sandakan.

Ribubonus CU is bordered by agricultural land on the north western boundary separating it from Ulu Tungud Forest Reserve. The Bukit Kuamas Forest Reserve borders the eastern portion of the estate with Kg. Wonod and Twin Acre Plantation located at the southern side. The Labuk River passes through the western boundary of this CU.

The map of Ribubonus CU (mill and estates) is shown in **Attachment 1** while their coordinates are detailed in **Table 1**.

Table 1
Location of Mill and Estates

Operating Unit	Latitude	Longitude
RPOM	5° 41' 19.977" N	117° 05' 34.150" E
Ribubonus Estate	5° 41' 32.763" N	117° 05' 49.962" E

(Note: The coordinates are for the offices of the palm oil mill and estates)

1.4 Description of Supply Base (Fruit Sources)

RPOM received FFBs from the Ribubonus Estate, smallholders and small growers. The actual FFB contribution by the Ribubonus Estate and outside sources for the last reporting period July 2013 to June 2014 is as detailed in **Table 3**.

Table 3
Actual FFB Contribution [Metric Tonne (MT)]
By Ribubonus Estate and Other Sources to RPOM
(July 2013 to June 2014)

Operating Unit	FFB Contribution	
	MT	%
Ribubonus Estate	90,817.870	57.59
Outsiders (non-certified)	66,879.740	42.41
Total	157,697.610	100.00

The projected FFB contribution by Ribubonus Estate and outside sources for the next reporting period (August 2014 to September 2015) is as in **Table 4**.

Table 4
Projected FFB Contribution (MT) by Ribubonus Estate and Other Sources to RPOM
(August 2014 to September 2015)

Operating Unit	FFB Contribution	
	MT	%
Ribubonus Estate	96,194.190	53.12
Outsiders (non-certified)	84,893.940	46.88
Total	181,088.130	100.00

1.5 Date of Planting and Cycle (Planted Area)

The planting profiles of all the directly managed supply bases are as shown in **Table 5**.

Table 5
Percentage of Area Planted in Ribubonus Estate

Year of Planting	Planting Cycle	Planted Area (ha)	Percentage of Planted Area
2000	1 st Generation	219.03	8.02
2001	1 st Generation	1,533.54	56.18
2002	1 st Generation	944.84	34.61
2007	1 st Generation	17.85	0.65

2009	1 st Generation	14.52	0.53
Total		2,729.78	100.00

1.6 Other Certifications Held

The RPOM and Ribubonus Estate do not hold any other form of third-party certification of their management systems. Nevertheless, the CU had been implementing an internal system which was based on the requirements of the ISO 14001:2004. The Ribubonus Estate had obtained the International Sustainability for Carbon Certification (ISCC) and also the RSPO Supply Chain Certification.

1.7 Organisational Information/Contact Person(s)

PPB through its Headquarter in Sandakan is responsible for overseeing the Ribubonus CU and other CUs owned by PPB in Sabah. The correspondence address and contact persons for this CU are as detailed below:

Address:

PPB Oil Palms Berhad
 Sabah Operations
 Lot 1A, KM 15, Jalan Labuk
 Locked Bag 34
 90009 Sandakan
 Sabah
 MALAYSIA

Contact Person (Sandakan):

Mr. Tee Seng Heng
 General Manager
 Phone: +6089 671546 / +6089 670208
 Fax: +6089 670260
 E-mail: teesh@wilmar.com.my

Contact person (at Ribubonus CU)

Name : Edward Jude
 Designation : Mill Manager
 Address : Sabahmas Plantations Sdn Bhd (Ribubonus Palm Oil Mill)
 Telephone : 088-552284
 Fax : 088-895211
 E-mail : ppb.rbpom@my.wilmar-intl.com

1.8 Time Bound Plan for Other Management Units

PPB owned and operates 6 palm oil mills in Sabah and 2 palm oil mills in Sarawak. The FFBS for the 6 mills in Sabah were supplied by 13 oil palm estates while 4 estates supplied their fruits to the 2 mills in Sarawak. PPB has been on schedule with the time bound plan for the certification of all the CUs. To-date, all the 8 CUs (palm oil mills) had been certified to the RSPO P&C MYNI.

SIRIM QAS International Sdn. Bhd. (SIRIM QAS International) had been involved with the certification of five of the CUs.

1.9 Area of Plantation

The plantation area is as in Table 4.

1.10 Approximate Tonnage Offered for Certification

The actual tonnage of CPO and PK produced and claimed for certification for the last reporting period (July 2013 to June 2014) is shown in **Table 6**.

Table 6
Actual FFB Received, CPO and PK Dispatched by RPOM
(July 2013 – June 2014)

	Total (MT)
FFB Received	136,300.98
FFB Processed	136,300.98
CPO Production	31,459.51
PK Production	5,786.9
CPO sold as MB	None. All certified CPO was sold under other sustainability certification.
PK sold as MB	3,322.94 (Jun 13 – July 14)
CPO sold as non-certified	12,853.38 (Jun 13 – July 14)
PK sold as non-certified	2,428.66 (Jun 13 – July 14)

The projected tonnage of CPO and PK produced and claimed for certification for the next reporting period (August 2014 to September 2015) is as shown in **Table 7**.

Table 7
Projected FFB received, CPO and PK Dispatched by RPOM
(August 2014 – September 2015)

	Total (MT)
FFB Received	181,088.130
FFB Processed	181,088.130
CPO Production	42,264.016
PK Production	8,192.827
Certified CPO to be sold as MB	22,450.686
Certified PK to be sold as MB	4,352.038
CPO to be sold as non-certified	19,813.330
PK to be sold as non-certified	3,840.789

1.11 Progress of Associated Smallholders or Outgrowers towards Compliance with Relevant Standards

Ribubonus CU had no plan or programmes to engage their associated smallholders/small growers towards compliance to relevant RSPO standard as the CU does not intend to apply for third-party contribution of FFB for claiming of certified CPO and PK.

PPB has signed a MoU with Wild Asia on 1st April 2014 where the company will support Wild Asia in attracting independent smallholders into their Wild Asia Group Scheme (WAGS). The aim of the scheme is to get independent smallholders to be RSPO certified.

1.12 Certification Details

Parent company	: PPB Oil Palms Berhad
RSPO Membership Number	: 1-0011-04-000-00
Member since	: 28/09/2004
Certificate Number	: RSPO 0009
Date of previous assessment	: 15 th to 16 st July 2013
Date of certification	: 7 September 2010

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 assessments related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many assessments for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved as a RSPO certification body on 21st March 2008.

2.2 Qualification of Lead Assessor and Assessment Team

The assessment team consisted of three assessors. The details of the assessors and their qualifications are detailed below:

Member of the Assessment Team	Role/area of RSPO requirements	Qualifications
Mohamed Hidhir Bin Zainal Abidin	Assessment Team Leader/ Supply Chain, OHS and environmental issues	<ul style="list-style-type: none"> • 4 years' experience in palm oil milling • Collected over 200 auditor days in auditing for RSPO • Qualified Lead Auditor for ISO 9001, ISO 14001 and OHSAS 18001 in 2014. • Collected more than 150 auditing days for OHSAS 18001, ISO14001 and ISO 9001 • Successfully completed IRCA/RABQSA accredited Lead Assessor training for ISO 9001, ISO14001 & OHSAS 18001 in 2012 • Successfully completed RSPO Lead Assessor Course in 2013 • B.Sc. (Hons) Chemical Engineering, Universiti Kebangsaan Malaysia (UKM)
Selvasingam T Kandiah	Assessor / GAP, safety and environmental issues	<ul style="list-style-type: none"> • Collected 46 days of RSPO audit. • Completed RSPO Training - 2012 • Attended RSPO workshop – 2013 • B. Sc. (Hons) Agriculture – University of Agricultural Sciences, Hebbal, Bangalore, India (1969-1973)

		<ul style="list-style-type: none"> • A Planter with Kumpulan Guthrie Berhad (1995-2002 – retired) • Inclusive of One year in Liberia and • 2 years in Estate Department in Kumpulan Guthrie Berhad, HQ
Mohd. Razman Salim	Assessor/HCV and social issues	<ul style="list-style-type: none"> • 6 years working experience related to forest management • Successfully completed ISO 14001 EMS RABQSA/IRCA approved Lead Assessor – 2013 • Successfully completed ISO 9001 QMS RABQSA/IRCA approved Lead Assessor – 2013 • Successfully completed OHSAS 18001 OHSMS RABQSA/IRCA accredited Lead Assessor Course – 2013

2.3 Assessment Methodology and Programme

This fourth surveillance assessment was conducted on 27-29 August 2014. The main objectives of this assessment were to:

- determine the continued compliance of the Ribubonus CU against the requirements of the RSPO MYNI:2010 and RSPO Supply Chain Certification Standard, November 2011;
- verify the effectiveness of the corrective actions being implemented by the Ribubonus CU to address the NCRs raised during the previous surveillance audit; and
- make appropriate recommendation on the continued certification of the Ribubonus CU based on the findings of this surveillance audit.

The surveillance assessment was guided by the sampling formula of $0.8 \sqrt{y}$. Nonetheless, the estate and the palm oil mill were visited in this assessment.

The assessment team carried out field and office assessments for conformance against the RSPO P&C MYNI 2010. The visits also covered HCV habitats, labour lines, storage areas and other workplaces.

Interviews, particularly with the employees, local communities and suppliers were conducted formally as well as informally, without the presence of CU's management personnel. In addition, records as well as other related documentation were also reviewed.

It is important to note that the finding from this assessment is based on samples taken from the organization activities, procedures, records etc. Statistically, there is always a possibility that one or more problematic issues/areas will remain unidentified during the course of this audit. The absence of non-compliance in any area or activity does not necessarily imply that no lapses or non-compliance exist.

The details on the surveillance assessment programme are presented in **Attachment 2**.

2.4 Stakeholder Consultation and List of Stakeholders Contacted

Not applicable.

2.5 Date of Next Surveillance Visit

The next surveillance assessment should be conducted within twelve months but not sooner than nine months from the approval date.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

The findings of this fourth annual surveillance assessment were highlighted and discussed during the on-site closing meeting. There were one (1) major and two (2) minor NCRs being raised on the Ribubonus CU's compliance against the requirements of the RSPO MYNI: 2010. The details of these NCRs and the corrective actions taken by the Ribubonus CU to address them are as in **Attachment 3**.

The detailed findings of the assessment on the CU's compliance with the requirements of the RPSO MYNI; 2010 are as follows:

Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicators		Comply Yes/No	Findings
C 1.1 Oil palm growers and millers provide adequate information to other 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	Records of requests and responses must be maintained. <i>Major</i> .	Yes	The estate had continued to maintain management documents relating to environmental, social and legal issues that were relevant to compliance with this Criterion. Records on requests for information or for these documents were maintained. The record books on requests for information showed that Ribubonus CU had not received any request for such information from external stakeholders since 2012.
C 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. This concerns management documents relating to environmental, social and legal issues that are relevant to compliance with RSPO Criteria.	1.2.1	Land titles / user rights (C 2.2)	Yes	Ribubonus CU had continued to hold and update copies of all the documents listed under Criterion 1.2 and ensured that they were made available in the estate and mill.
	1.2.2	Safety and health plan (C 4.7)	Yes	Safety and Health plan was available at the CU. (Cross refer to C 4.7).
	1.2.3	Plans and impact assessments relating to environmental and social impacts (C 5.1, 6.1, 7.1, 7.3)	Yes	Assessments on HCV and social impacts were made available in the estates and mills. On environmental impacts assessment (EIA), Ribubonus CU had continued to monitor on the environmental impacts based on the Environmental Compliance Report (ECR) carried out as per the

Documents that must be publicly available include, but are not necessarily limited to:-				required frequency. Latest ECR dated June 2014 was made available for viewing. (Refer to findings on C 5.1).
	1.2.4	Pollution prevention plans (C 5.6)	Yes	Action plan to mitigate pollution was made publicly available. (Cross refer findings on C5.6).
	1.2.5	Details of complaints and grievances (C 6.3)	Yes	Details on the complaints and grievances at RPOM and Ribubonus Estate were recorded in the Complaint Form, Request Form, verbally and through meetings with internal and external stakeholders namely Stakeholders Meeting, Social Welfare Committee Meeting and Women and Children Welfare Committee Meeting. All the documents were made available at the visited estates and mill.
	1.2.6	Negotiation procedures (C 6.4)	Yes	Ribubonus CU has continued to use the standard procedure for handling complaints and grievances by following 'Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation' and 'Consultation and Communication - Procedure for Collective Negotiations and Resolution of Disputes or Grievances'. All the documents were made available at the estate and mill.
	1.2.7	Continuous improvement plan (C 8.1)	Yes	The 'HCV monitoring and management action plan 2014' and 'SIA Management Action Plan 2014' have been established and were made available at the mill and estate. Some improvements were sighted with regards to Good Agricultural Practice on buffalo assisted harvesting, planting of beneficial plants to improve on the Integrated Pest Management and to minimising/reducing pesticide use as well as thinning out of runts and abnormal palms.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators		Comply Yes/No	Findings
<p>C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations</p>	2.1.1	Evidence of compliance with legal requirements. <i>Major</i>	No	<p>Ribubonus CU continued to comply with most of the applicable local, national and ratified international laws and regulations.</p> <p>With respect to the <i>Noise Exposure Regulations 1989</i>, the last audiometric testing was carried out in August 2014. However, the requirement on frequency of testing, Reg 22 had not been complied with as some of the workers who suffered from hearing impairment had not been included in the annual audiometric testing. Hence, a major NCR MH1 was issued.</p>
	2.1.2	A documented system, which includes written information on legal requirements. <i>Minor</i>	Yes	<p>The legal Register had been updated to include the Electricity Act 1990 and Section 19 to Section 49 of the Electrical Regulation 1994 (competent person) and approved by Mr Edrin Moss.</p>
	2.1.3	A mechanism for ensuring that they are implemented. <i>Minor</i>	Yes	<p>There was evidence of the CU's compliance with the legal requirements which had been verified on an annual basis through internal and external audits, PA visits, VA visits and by an independent third-party audit such as RSPO certification audits.</p>
	2.1.4	A system for tracking any changes in the law. <i>Minor</i>	Yes	<p>Ribubonus CU had continued to have in place a mechanism for tracking changes and ensuring compliance to applicable legal and other requirements. It was done by the Sustainability Manager, East Malaysia, and was conducted in accordance with the relevant procedures and requirements by the Corporate Social Responsibility (CSR) Department.</p>
<p>C 2.2 The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights.</p>	2.2.1	Evidence of legal ownership of the land including history of land tenure. <i>Major</i>	Yes	<p>Ribubonus Estate still had a 99 year lease (1st January 1998 until 31st December 2096) on the land from the Sabah State government and the condition of the lease was for 'Agriculture Purpose'. The estate (3,262 ha) was found to be in compliance with that lease condition.</p>

	2.2.2	Growers must show that they comply with the terms of the land title. [This indicator is to be read with Guidance 2] <i>Major</i>	Yes	The estate was still in compliance with the condition as stated in the terms and conditions of the lease agreements that the land would be for agricultural purpose. The lease agreement would be expiring on 31 st December 2096.
	2.2.3.1	Evidence that boundary stones along the perimeter adjacent to state land and other reserves are being located and visibly maintained. <i>Minor</i>	Yes	<p>The land boundaries of the estates adjacent to Twin Acres Sdn Bhd, and Bukit Kuamas Forest Reserve had clearly been mapped and so were the boundaries with the other neighbouring estate companies; Bentera Hijau Sdn Bhd, Sparkle Rewards and Darul Harapan and the nearest villagers from Kg Gading, Kg. Melapi, Kg. Wonod, Kg Ansuan and Kg. Baba.</p> <p>During a site inspection conducted in Ribubonus estate, the boundary stones number 168/S805 in Block 3 (adjacent to Bukit Kuamas Forest Reserve) and 173/805 in Block 4 (adjacent with Twin Acres Sdn Bhd) were checked. It was observed that there were still distinct red coloured wooden boundary markers erected by the estate and their positions had been labelled and marked on the boundary stone maps and the positions recorded.</p>
	2.2.3.2	Where there are, or have been, disputes, proof of resolution or progress towards resolution by conflict resolution processes acceptable to all parties are implemented. Cross ref. to 2.3.3, 6.4.1 and 6.4.2. <i>Minor</i>	Yes	<p>As reported in the previous surveillance report there was a claim to land in Ribubonus Estate by the local villagers from Kampung Telupid Batu 4 and Kampung Gading. Through the mechanism of the Stakeholders Meeting with the guidance of the established procedure for identifying legal and customary rights and for identifying people entitled to compensation (<i>Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation</i>), Ribubonus Estate had clarified its legal rights over the disputed land with the Persatuan Rakyat, Kampung Telupid Batu 4. It had been established that the CU was not involved in illegal occupation of NCR land (the process was documented in file: <i>Tuntutan Tanah Adat (NCR) Daripada Penduduk Kampung Telupid Batu 4</i>).</p> <p>Ribubonus Estate and Persatuan Rakyat had referred the claims to the Beluran District Office and Land and Survey Department. Based on the official letter (RB/Claim Tanah/02/13102010) of the Collector</p>

				of Land Revenue (Pemungut Hasil Tanah) Beluran had approved that the plantation land belonged to the Ribubonus CU.
C 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.	2.3.1	Where lands are encumbered by customary rights, participatory mapping should be conducted to construct maps that show the extent of these rights. <i>Major</i>	Yes	As described in the findings under Indicator 2.2.4, there was no land dispute and therefore no land within Ribubonus Estate had been encumbered by customary rights.
	2.3.2	Map of appropriate scale showing extent of claims under dispute. <i>Major</i>	Yes	Not applicable.
	2.3.3	Copies of negotiated agreements detailing process of consent (C2.2, 7.5 and 7.6). <i>Minor</i>	Yes	Not applicable.

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

Clause	Indicators		Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	Annual budget with a minimum 2 years of projection <i>Major</i>	Yes	<p>Ribubonus CU had continued with its commitment to achieving long-term economic and financial viability. Budget projections up to financial year 2024 were made available to the auditors.</p> <p>The budget parameters being monitored remained essentially unchanged, which were Capital (CAPEX) and Operating (OPEX) costs. The operating expenditures included expenditure for oil palm upkeep, administration, housing and machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training, etc.</p> <p>For RPOM, allocation of CAPEX and OPEX on environmental concern and safety, health and welfare was evident. CAPEX was on</p>

				<p>the tertiary treatment plant for BOD reduction, composting concrete slab, EFB retention wall and CEMS system upgrade totalling RM 2,464,500.</p> <p>In order to enhance palm performance, Ribubonus CU had embarked on a thinning out programme. Etiolated, unproductive, abnormal palms and runts were poisoned. This had not only enhanced palm performance but resulted in lower maintenance and fertiliser costs.</p> <p>The estate had introduced “Buffalo Assisted Harvesting” this year with 13 male buffalos in harvesting a 320 ha block in the North Division. This was to improve on the harvester productivity and harvester to land ratio from the 1:17 to 1:25.</p>
	3.1.2	Annual replanting programme projected for a minimum of 5 years with yearly review. <i>Minor</i>	Yes	All the oil palms planted in the Ribubonus Estate were of the 1 st generation and were planted between the years 2000 and 2009. The palms being still young would not be replanted within the next 5 years. As such there would be no replanting program within the next 5 years.

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

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented and consistently implemented and monitored.	4.1.1	Documented Standard Operating Procedures (SOP) for estates and mills. <i>Major</i>	Yes	<p>Ribubonus CU had continued to use the ‘Wilmar International Limited’s Agriculture Manual (AM) and Safe Standard Operating Procedure (SSOP) for their operating procedures.</p> <p>It was observed that the SSOPs had continued to be communicated to the workers as evident during interviews with the workers involved with oil palm harvesting, herbicide spraying, pruning, etc.</p> <p>RPOM had continued to implement the SSOP related to oil palm processing, boiler operation, effluent treatment plant, products analysis method, workshop activity and chemical and waste handling. The SSOP for mill operation had continuously being used and implemented. There was no change of procedure since the last audit.</p>

				The latest procedure dated Nov 2011 covered all the main activities in the mill operations.
	4.1.2	Records of monitoring and the actions taken are maintained and kept for a minimum of 12 months. <i>Minor</i>	Yes	<p>Records of monitoring and the actions taken by the estate had continued to be maintained and kept for a minimum of 12 months. Among the record being kept was monthly progress, monthly costing and annual reports on monitoring of all activities as well as monthly report to MPOB. In addition, there were reports by the PA and Head of R&D, rainfall data, pest census, agrochemicals usage and schedule and completion sheets (Programme Sheets) on activities such as weeding, fertilizer application, EFB application and road maintenance, etc.</p> <p>A KPI system which had been introduced since 2011 for monitoring quality and efficiency was still being implemented. Records made available on KPI for harvesting covered items such as uncollected loose fruits, unripe and rotten FFB bunches, crop production, etc.</p> <p>In addition, there were monitoring records specified by the Environmental Protection Department Sabah entitled “<i>Laporan Pemantauan dan Pematuhan Syarat-syarat Alam Sekitar</i>” or <i>Environmental Compliance Report (ECR)</i> and scheduled wastes related records. All these records were being retained for not less than 12 months.</p> <p>In the mill, there were monthly records of monitoring on effluent, black smoke, scheduled waste and quarterly reports submitted to the DOE. In addition, there were monthly performance reports for submission to the MPOB (EL) MF4 and MPOB PX4-MF. These monitoring reports were kept and maintained in the offices for at least a year.</p>
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	Monitoring of fertilizer inputs through annual fertilizer recommendations. <i>Minor</i>	Yes	Ribubonus Estate had continued to maintain soil fertility by regular application of inorganic fertilizers, empty fruit bunches (EFBs) and POME, mulching, proper frond stacking (biomass) and by maintaining soft weeds within interlines.

				<p>The Estate had continued to apply fertilisers as per EMU recommendations made by Head of R&D Department. The annual fertiliser recommendations were still made based on annual foliar sampling. Fertiliser application program was monitored using Field Cost Book, Bin Cards and Monthly Fertiliser Return forms.</p> <p>The main fertilisers being applied were RP, MOP, Urea, Kieserite, Borate, NPK super, NK3, SOA, GML and bunch Ash. Records being sighted had shown that the actual amount of fertilizer being applied in 2013 was in line with the fertilizer application program with a total of 3,759.45 MT.</p> <p>For 2014, a total of 4,472.46 MT of fertilisers had been recommended of which as in July 1,373.10 MT had been applied.</p>
	4.2.2	Evidence of periodic tissue and soil sampling to monitor changes in nutrient status. <i>Minor</i>	Yes	<p>The estate had continued to carry out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca and B had been carried out and the results formed the basis for the fertiliser recommendations to improve soil fertility. The foliar sampling which was carried out in March 2013 formed the basis for the 2014 fertiliser recommendation. The latest sampling was done in February 2014, the results of which would be used as the basis for the formulation of the fertiliser recommendation for 2015.</p> <p>Analysis on soil organic carbon was carried out every 5 years as per the requirement of International Sustainable Carbon Certification (ISCC) and was last done on 06/06/2011.</p>
	4.2.3	Monitor the area on which EFB, POME and zero-burn replanting is applied. <i>Minor</i>	Yes	<p>Ribubonus Estate had a programme to apply 38,465 MT of EFB as organic fertilizer for the years 2013 and 2014. In 2013 and as of July 2014, 19,920.80 MT and 2,147.28 MT respectively of EFB had been applied. The monthly records of EFB usage (block by block) were made available along with maps of application for 2012, 2013 and 2014. The EFBs were being applied at a rate of 80 MT per hectare and laid out as a single layer to allow for better decomposition and loss of nutrient.</p>

				In addition, the Estate had also applied EFB to all beneficial plants. Ribubonus Estate had continued to carry out POME application which was controlled and monitored by the mill.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Documented evidence of practices minimizing soil erosion and degradation (including maps). <i>Minor</i>	Yes	<p>Practices to minimise and control erosion and degradation of soils were documented in the AM and SSOP in chapter 4 on planting cover crop and chapter 6 part 2 on frond stacking and maintenance of ground covers.</p> <p>Slope classification map for the estate was still made available. There were terraces in all sloping areas with regular bunds to retain water and as erosion control measure.</p> <p>Planting of cover crops was implemented along steep slopes. As mentioned in the findings on Indicator 4.2.3, the application of EFBs as fertilizer had further assisted in reducing erosion. Fronds staking had continued to reduce erosion along slopes. For slopes, planting of <i>Mucuna bracteata</i> and Vertiver grass was still being done. Map of planted areas and areas to be planted was presented. It was also observed that the presence of the fern <i>Neprolepis biserrata</i> cover in many fields and slopes had reduced exposed areas.</p> <p>The estate had continued to have soil erosion monitoring plots laid out in 3 different terrains and conditions as 0-12° (shaded), 0-12° (open), 12°-25° (open), 12°-25° (shaded); > 25° (open) and > 25° (shaded).</p>
	4.3.2	Avoid or minimize bare or exposed soil within estates. <i>Minor</i>	Yes	<p>In order to avoid/minimise bare or exposed soil, the estates had continued the uprooting of weeds in the inter rows with minimum spraying of palm circles and harvester paths. No blanket spraying was also being advocated.</p> <p>Bare ground condition has not been allowed in these estates. Item 1.1 of WAM, Chap 6 Upkeep and Maintenance of Oil Palm, Part 2: Upkeep of Mature Oil Palm requires full ground cover in the inter-row to be maintained. There was no bare ground sighted during the visit.</p>

	4.3.3	Presence of road maintenance programme. <i>Minor</i>	Yes	<p>During the field visit, it was observed that road conditions and accessibility were satisfactory and made possible through regular maintenance guided by a good road maintenance programmes.</p> <p>Rain water was drained into the terraces and lower slopes. The estate had a good supply of stones from its own quarry thus had maintained well paved roads and in good condition. The roads were cambered and therefore had a good water runoff. In low lying areas, drains were cleaned and maintained using excavators.</p>
	4.3.4	Subsidence of peat soils should be minimised through an effective and documented water management programme. <i>Minor</i>	Yes	There was no peat soil in the estate.
	4.3.5	Best management practices should be in place for other fragile and problem soils (e.g. sandy, low organic matter and acid sulphate soils). <i>Minor</i>	Yes	There were no fragile soils and problem soils in the estate.
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate. <i>Major</i>	Yes	There CU had continued to use the <i>Riparian Zone Management Guideline - PPB Oil Palm Sabah Operation</i> for protection of riparian belts along the major rivers. During an inspection on the boundaries of these riparian belts along the bank of the Sg. Labuk, it was observed that they were still being clearly demarcated with red paint around the trunks and there were blue signboards erected. Natural vegetation had colonized these riparian buffer belts as no weeding or fertilizer application was allowed. There were no traces of agrochemical spraying along the riparian zone.
	4.4.2	No construction of bunds/weirs/dams across the main rivers or waterways passing through an estate. <i>Major</i>	Yes	There was no construction of bridges/weirs/dams across the rivers at Sg Labuk in the Ribubonus Estate. All waterways flowed without any obstruction.

	4.4.3	Outgoing water into main natural waterways should be monitored at a frequency that reflects the estates and mills current activities which may have negative impacts (Cross reference to C 5.1 and 8.1). <i>Major</i>	Yes	<p>Outgoing water into main natural waterways was monitored at a frequency that reflects the estates and mills current activities which may have negative impacts. The latest monitoring was conducted on 19 May 2014.t</p> <p>For Ribubonus Estate, the water quality index (WQI) for a selected stream was still being monitored at the point where the stream existed (outlet) of the estate. The water sampling was done once every three months as specified in the EIA approval by the Department of Environment Protection Sabah.</p> <p>The quality of the water samples taken from the selected rivers was found to be within the acceptable level of quality index of Class II B category in accordance to the interim national water quality standard 2006 (INWQS) of the DOE. The monitoring reports were still being submitted to the Environmental Protection Department of Sabah as required under the EIA approval.</p> <p>It was observed that the estate had continued to implement action plans and continuous improvement programmes to minimize pollutant to the protected areas as recommended in the EIA report.</p>
	4.4.4	Monitoring rainfall data for proper water management. <i>Minor</i>	Yes	<p>Data on rainfall was collected by the estate. Records on rainfall from 1999 to July 2014 were made available and these were examined by the audit team.</p> <p>Domestic water consumption record for years 2013 and 2014 and Ribubonus Estate Water Management Plan were examined. The data of water usage for 2013 was 168.71 litres per day per consumer while in 2014 (until April) it was 146.75 litres per day per consumer. The data was not very precise as the number of dependents in each household has not been included in the calculation.</p>
	4.4.5	Monitoring of water usage in mills (tonnage water use/tonne FFB processed). <i>Minor</i>	Yes	<p>RPOM had continued to monitor its water usage per tonne of FFB processed and this was being recorded in the Summary of Process and Boiler Water Consumption. The water usage in RPOM for 2013 – 2014 (until July) had increased as follows:</p>

				Year	Process water	Boiler water	Total
				2012	0.83 m ³ /ton FFB	0.83 m ³ /ton FFB	1.63 m ³ /ton FFB
				2013	0.83 m ³ /ton FFB	0.86 m ³ /ton FFB	1.69 m ³ /ton FFB
				2014 (until July)	0.78 m ³ /ton FFB	0.97 m ³ /ton FFB	1.75 m ³ /ton FFB
	4.4.6	Water drainage into protected areas is avoided wherever possible. Appropriate mitigating measures will be implemented following consultation with relevant stakeholders. <i>Minor</i>	Yes	There is no evidence on water drainage into protected areas			
	4.4.7	Evidence of water management plans. <i>Minor</i>	Yes	A Water Management Plan to conserve water for estate and surrounding facilities like the clinic, Humana School, all staff and workers quarters was made available. The plan covered general water management, water quality and water management during emergency. It also covered water saving practices, and water discharge.			
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	4.5.1	Documented IPM system. <i>Minor</i>	Yes	Ribubonus Estate had continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the AM. In order to minimize use of Insecticides, the estates had continued to plant beneficial plants mainly <i>Tunera subulata</i> , <i>Tunera ulmifolia</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> .			
	4.5.2	Monitoring extent of IPM implementation for major pests. <i>Minor</i>	Yes	Ribubonus Estate had continued to carry out monthly detection and census on leaf eating and mammalian pests. Records had shown no outbreak of pest infestation had taken place. Rat baiting had still not been carried out as there had been no serious pest attack being detected.			

	4.5.3	Recording areas where pesticides have been used. <i>Minor</i>	Yes	Ribubonus estate had continued to record areas where pesticides had been used in the bin cards, field cost book and in program sheets.
	4.5.4	Monitoring of pesticide usage units per hectare or per ton crop e.g. total quantity of active ingredient (a.i.) used/ tonne of oil. <i>Minor</i>	Yes	Ribubonus Estate had continued to record on the small quantity of pesticides being used.
C 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.	4.6.1	Written justification in Standard Operating Procedures (SOP) of all agrochemicals use. <i>Major</i>	Yes	<p>The use of all agrochemicals at Ribubonus Estate was still being guided by the AM and SOP where written justifications shall be provided. The AM had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The application of an agrochemical was still based on the 'need to do basis' to enhance field operations.</p> <p>No Class I & II chemicals had ever been used and use of paraquat had been stopped.</p> <p>Ribubonus Estate had not practised prophylactic use of insecticides, fungicides and rodenticides. Rat baiting would be carried out only if damage on FFB bunches exceeds 5% and that the estate had still not practised calendar baiting.</p>
	4.6.2	Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). <i>Major</i>	Yes	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The estates had continued to use only class III & class IV pesticides.</p> <p>No illegal agrochemicals (stated by local and international laws) in particular paraquat, had been used or found. Paraquat had totally been replaced by a systemic herbicide, glufosinate ammonium.</p>
	4.6.3	Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and	Yes	All pesticides were still stored in accordance with the legal requirement as well as recommendation by manufacturer inside the MSDS. The stores were still equipped with ventilation fan, showers, wash area and PPE storage area. Adequate safety signages posted at the storage area with the colour code used to distinguish the

		Pesticides Act 1974 (Act 149) and Regulations. <i>Major</i>		chemical class. For emergency preparedness, eye wash and shower were still available as well as the spill kit to handle emergencies. Empty pesticides containers were still found being triple rinsed and pierced in the schedule waste storage in the estate and disposed off by the appointed DOA contractor in Sabah.
	4.6.4	All information regarding the chemicals and its usage, hazards, trade and generic names must be available in language understood by workers or explained carefully to them by a plantation management official at operating unit level. <i>Major</i>	Yes	All information regarding the chemicals and their usage, hazards, trade and generic names and the MSDS for pesticides were available in both English & Bahasa Malaysia languages and understood by the workers. Relevant information on the agrochemical being used in the estate was conveyed to the workers during the morning muster and through the use of safety pictorial posters. Based on random interviews held with the workers who had been involved in spraying and applying these chemicals, it was found that they had a good understanding on them. It was also verified that training on chemical handling especially for the sprayers had been conducted with the aim to disseminate the correct information and ensuring that the sprayers properly understand on the usage and hazards of agrochemicals.
	4.6.5	Annual medical surveillance as per CHRA for plantation pesticide operators. <i>Major</i>	Yes	The last CHRA for Ribubonus Estate was conducted on 26 th September 2009 by CHRA Industrial Hygiene Services Sdn. Bhd. The CHRA report would expire in September 2014. As the reassessment was still in progress, this would be verified in the next audit. Medical surveillance was recommended for workers who handled pesticides and manure. Store keeper, chemical mixer, sprayer and manurer are among the operators to be sent for medical surveillance. The medical reports showed that all the sprayers were healthy and suffered no detrimental effects as a result of performing their job.
	4.6.6	No work with pesticides for confirmed pregnant and breast-feeding women. <i>Major</i>	Yes	Pregnant and breast-feeding women were still not allowed to work with pesticides. The Medical Assistant (MA) still checked and determined whether female workers were pregnant using the Urine

				<p>Pregnancy Test (UPT). Records for 2013 and 2014 were examined and it was found that 3 female workers involved in manuring, spraying and store keeping were confirmed pregnant. Medical Removal Protection had been initiated and the management was informed to move them to other tasks with no exposures to chemicals.</p> <p>Interviews conducted with the sprayers had revealed that they had fully understood that pregnant and breast feeding women should not carry out any work dealing with pesticides.</p>
4.6.7	Documentary evidence that use of chemicals categorised as World Health Organisation Type 1A or 1B, or listed by the Stockholm or Rotterdam Conventions and paraquat, is reduced and/or eliminated. Adoption of suitable economic alternative to paraquat as suggested by the EB pending outcome of the RSPO study on IWM. <i>Minor</i>	Yes	<p>During the assessment, it was noted that Ribubonus Estate had continued not to use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <p>Paraquat had not been used, the estate had instead used the systemic herbicide, glufosinate ammonium.</p>	
4.6.8	<p>Documented justification of any aerial application of agrochemicals.</p> <p>No aerial spraying unless approved by relevant authorities. <i>Major</i></p>	Yes	Examination of records had shown that no aerial spraying had been conducted in the estate.	
4.6.9	Evidence of chemical residues in CPO testing, as requested and conducted by the buyers. <i>Minor</i>	Yes	There was no request from buyer for chemical residue testing in CPO.	
4.6.10	Records of pesticide use (including active ingredients	Yes	The CU had continued to monitor the use of pesticides since 2009 in the chemical register. Record sheets documenting the amount and	

		used, area treated, amount applied per ha and number of applications) are maintained for either a minimum of 5 years or starting November 2007. <i>Minor</i>		types of chemicals used in each field, its area in ha and % a.i. for each month of the year was presented. A summary of chemicals used in the estate for each month was also provided to the audit team.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented.	4.7.1	Evidence of documented Occupational Safety Health (OSH) plan which is in compliance with OSH Act 1994 and Factory and Machinery Act 1967 (Act139). <i>Major</i> The safety and health (OSH) plan shall cover the following		
	a)	A safety and health policy, which is communicated and implemented	Yes	Ribubonus CU had continued to adopt the PPB Group's Occupational Health Safety policy. In line with this policy, the OSH plan and programmes had been communicated and implemented at all levels of the organization. Interviews held with the employees had shown that they had been made aware of the OSH policy, objectives and programmes. The 2014 OSH plan has incorporated and continued to address issues related to hazard identification risk assessment and risk control (HIRARC), medical surveillance programme, OSH training among staff and also the 3 rd party inspection and monitoring programme as required under USECHH 2000 regulation. Among the programmes carried out were health surveillance and chemical expose monitoring.
	b)	All operations have been risk assessed and documented.	Yes	Ribubonus CU had continued to review the significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) as well as CHRA records were verified during this surveillance. In the estates, the HIRARC covered on activities such as chemical mixing and

				spraying, chemical storage, harvesting and FFB collection, machine maintenance and working in confined space. In the mill, HIRARC was done on FFB sterilization, kernel and oil extraction, clarification process as well as maintenance activities. The issue on HIRARC identified during the previous year had been up-dated and included in the HIRARC register.
	c)	An awareness and training programme which includes the following specifics for pesticides : i. to ensure all workers involved have been adequately trained in a safe working practices (See also C 4.8) ii. all precautions attached to products should be properly observed and applied to the workers.	Yes	All of the workers had continued to be informed on chemical hazards through awareness and training programme. Those trained included sprayers, manure spreaders, laboratory personnel, boilerman and store clerk. From field inspection and observation on spraying activities, it was confirmed that the chemicals being applied were in accordance with the product safety precautions. MSDS was made available at point of use – for example, at the estate water treatment plant, boiler chemical dosing area, chemical mixing area and at the chemical store.
	d)	The appropriate personal protective equipment (PPE) are used for each risk assessed operation. i. Companies to provide the appropriate PPE at the place of work to cover all potentially hazardous operations such as pesticide application, land preparation, harvesting and if used, burning.	Yes	Suitable PPE had continued to be provided to the workers based on the information in the MSDS and CHRA assessor's recommendation. It was observed that signages (to remind workers to wear appropriate PPE) were still being posted at the appropriate places. Workers interviewed had understood the reasons and importance of wearing PPE.
	e)	The responsible person (s) should be identified.	Yes	<u>Ribubonus Mill</u> An organization chart of the Safety and Health Committee was made available showing the names of representatives from the workers and

				<p>management. Mr. Daniel Sinto – Mill Engineer was the Committee Secretary.</p> <p><u>Ribubonus Estate</u> An organisation chart of the Safety and Health Committee was made available showing the names of representatives from the workers and management. Siti Malisah Abdul Malik– Estate Assistant was Committee Secretary.</p>
f)	There are records of regular meetings between the responsible person(s) and workers where concerns of workers about health and safety are discussed.	Yes		The Quarterly Safety & Health Committee meeting had continued to be held at the respective unit in the CU chaired by manager (mill or estate). The latest meetings of the Committee at the mill and estate were held on 20/7/14 and 25/7/14 respectively.
g)	Accident and emergency procedures should exist and instructions should be clearly understood by all workers.	Yes		The Generic Emergency Response Plan (ERP) was still being used. Information on response to potential emergencies had been disseminated. Instructions on response to accident and emergency situation were tested and it was found to have been clearly understood by all workers interviewed both at the mill and field. The latest fire drill was carried out on 17-19 July 2014 for Ribubonus Estate and the workers' housing located at the northern and eastern parts of the estate.
h)	Workers trained in First Aid should be present in both field and mill operations.	Yes		Trained first aider was still available at all work area both in the estate and mill. Based on the training record, it was found that most of the estate mandore and department head had been trained on first aid. The latest refresher training on first aid was conducted on 9/6/14 by the MA, Mr Jorge Canda.
i)	First Aid equipment should be available at worksites	Yes		First Aid Kit was still made available and properly maintained in the estate and mill. Each work area for example spraying, manuring and harvesting has continued to be supplied with the first aid kit. Trained first aider had continued to monitor the usage. The MA had continued to replenish the kit on monthly basis.
4.7.2	Records should be kept of all accidents and periodically	Yes		Accident statistics were being maintained and periodically reviewed during safety and health committee meeting. The DOSH would be

		reviewed at quarterly intervals. <i>Major</i>		<p>notified if there was an accident with more than 4 days of MC using JKKP 6 form and annual accident statistic using JKKP 8 form. Accident statistic for Ribubonus mill and estate as follows :</p> <table border="1"> <thead> <tr> <th></th> <th>Ribubonus Mill</th> <th>Ribubonus Estate</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>3 (5 LTA)</td> <td>30 (27 LTA)</td> </tr> <tr> <td>2014 (to date July)</td> <td>5 (18 LTA)</td> <td>14 (117 LTA)</td> </tr> </tbody> </table> <p>*LTA : lost time accident Accident investigation had continued to be carried out on all accident cases for internal reporting and reporting to DOSH. Records of accident investigation had been properly kept for future reference.</p>		Ribubonus Mill	Ribubonus Estate	2013	3 (5 LTA)	30 (27 LTA)	2014 (to date July)	5 (18 LTA)	14 (117 LTA)
	Ribubonus Mill	Ribubonus Estate											
2013	3 (5 LTA)	30 (27 LTA)											
2014 (to date July)	5 (18 LTA)	14 (117 LTA)											
	4.7.3	Workers should be covered by accident insurance. <i>Major</i>	Yes	<p>Ribubonus CU had continued to ensure all workers in the mill and estate were covered by insurance. All local workers were still being covered by SOCSO as required under Employee's Social Security Act 1969. Foreign workers were covered by insurance as per the Workmen Compensation Act 1952.</p> <p>It was found that all foreign workers in the mill had continued to be insured. There were a total of 21 workers covered by insurance under Policy Number W183690 which is valid until 31/12/14.</p>									
C 4.8 All staff, workers, smallholders and contractors are appropriately trained.	4.8.1	A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training for employees are kept. <i>Major</i>	Yes	<p>Training plan for 2014 has been established with target dates for the training identified. The training program includes:</p> <ul style="list-style-type: none"> • Chemical & Spraying Safety Training • Fire and evacuation drill • First Aid Training • Chemical Handling Training • Scheduled waste management (EiMAS) • ETP competent person training (EiMAS) • Harvesting Safety • HCV awareness training • Sexual harassment training • ISCC and RSPO SCCS awareness training <p>Records of training were made available.</p>									

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

Clause	Indicators		Comply Yes/No	Findings
<p>C 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.</p>	5.1.1	<p>Documented aspects and impacts risk assessment that is periodically reviewed and updated. <i>Major</i></p>	Yes	<p>An environmental impact assessment (EIA) on the activities of the Ribubonus Estate was done by a consultant (Ekohandal Sdn. Bhd.) in January 2010. The EIA Report was dated 14/2/ 2008 entitled “Proposed Replanting of Oil Palm Plantation Development at Ribubonus Estate in Beluran, Sabah”. The report has been approved by the Environment Protection Department Sabah on 26/1/2010 [(ref.: JPAS/PP/02/600-1/11/1/72)].</p> <p>Most of the action plans as outlined in the EIA Report had been adequately implemented. The same consultant was appointed to conduct a quarterly evaluation of the CU’s compliance against the conditions as stipulated in the approval letter of the Environment Protection Department Sabah.</p> <p>For RPOM, the identification of environmental aspect and impact was done by its mill staff and with the assistance of safety and sustainability department. Mitigation measures were established thereafter.</p>
	5.1.2	<p>Environmental improvement plan to mitigate the negative impacts and promote the positive ones, is developed, implemented and monitored. <i>Minor</i></p>	Yes	<p><u>Ribubonus Estate</u> Ribubonus Estate had continued to implement a management plan which was being reviewed once a year. The latest review was done in 2014. The contents of the management plan reflects the recommendations made by Ekohandal.</p> <p><u>Ribubonus Mill</u> As a follow-up to the EAI, mitigation measures had been defined normally in the form of SSOP, Working Instruction (WI) to ensure proper operational controls.</p>
<p>C 5.2 The status of rare, threatened or endangered species (ERTs) and</p>	5.2.1	<p>Identification and assessment of HCV habitats and protected areas within</p>	Yes	<p>The HCVF scoping assessment of the estate was completed in February 2009 and sites with attributes HCV 4 being identified. In addition to the report ‘<i>HCVF Scoping Assessment of Ribubonus</i></p>

<p>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.</p>		<p>landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings. <i>Major</i></p>		<p><i>Estate of PPB Oil Palms Berhad</i> a HCV Report had also been prepared. The HCV Monitoring and Management Action Plan 2011-2015, was presented to the assessment team together with the Action Plan for HCV Report.</p> <p>Ribubonus Estate being bordered by Bukit Kuamas Forest Reserve (Class1-Protection Forest) had established linkages with the residual forest sites within the estate. These sites were protected as HCV 4 sites and appropriate signage had been erected.</p> <p>There was only a HCV 4 been identified in the Ribubonus Estate, which is a small steep area of river buffer zone of the Sungai Labuk.</p> <p>Consultations with an NGO on the identification of ERT species and HCV sites had been conducted in March 2013 and a study had been scheduled in October 2013. However the study started only in May 2014. Camera traps had also been set up by the Sustainability Department to document the presence of potential ERT fauna in the conservation sites. The attributes for conservation in the HCV sites would be reviewed following this study.</p> <p>Poaching was still not allowed within the plantation with warning signage being placed at the entrances of the estate. Posters on protected animals had continued to be displayed at the guard posts. There was no encroachment into the Bukit Kuamas Forest Reserve by outsiders being detected since the last audit.</p> <p>Evidence of a commitment to discourage any illegal or inappropriate hunting had continued to be instituted through control of the entrance gates and monitoring teams. An honorary wildlife warden had been trained in 2011.</p>
	5.2.2	<p>Management plan for HCV habitats (including ERTs) and their conservation. <i>Major</i></p>	Yes	<p>Ribubonus CU had conserved 768.23 ha of riparian zone, river and forested area which provides basic services as control of natural water flow and biological diversity refuge. The HCV map was also made available.</p>

				<p>Ribubonus CU has improved its monitoring on the living flora and fauna especially on the ERT species within the oil palm plantation and forested area by conducting wildlife survey of terrestrial mammals and birds using camera trapping method. The survey progress report had identified three protected species; leopard cat, lesser mouse deer and long-tailed macaques.</p> <p>The Ribubonus Estate has the following future plan to conserve these protected species:</p> <ul style="list-style-type: none"> • wildlife identification and camera trap monitoring • ensuring no encroachment. • erecting signboard of HCV1 at the conservation area • training on wildlife identification for HCV Officer • conduct awareness training with the Sabah Wildlife Department
	5.2.3	Evidence of a commitment to discourage any illegal or inappropriate hunting fishing or collecting activities, and developing responsible measures to resolve human-wildlife conflicts. <i>Minor</i>	Yes	<p>Ribubonus Estate had continued to discourage illegal or inappropriate hunting or collecting activities. Warning signage was still strategically placed along boundaries especially with smallholders (entrance of estate) and at HCVs areas and joint border monitoring on illegal hunting and logging in adjacent forest reserve with the State Forestry Department Sabah. Posters on protected animals were still being displayed at the guard posts and at Ribubonus Estate.</p> <p>Marcie Elene M.J. and his team have conducted monthly HCV monitoring to detect on activities such as illegal logging, hunters, encroachment, water pollution, forest fire, etc.</p>
C 5.3 Waste is reduced, recycled, re-used and disposed off in an environmentally and socially responsible manner.	5.3.1	Documented identification of all waste products and sources of pollution. <i>Major</i>	Yes	<p>Identified recyclable wastes were plastic (from household, inner-layer of fertilizer bags), paper (from office & household) and metal (from workshop & household) sent to recycle centre. Residual of domestic waste other than recyclable item were still being collected and buried at the estate's landfill.</p> <p>For the mill, there were no changes on the sources of pollution and wastes generated from mill processes and related activities.</p>
	5.3.2	Having identified wastes and pollutants, an operational	No	Ribubonus CU had continued to implement the established operational plan to avoid and reduce pollution based on the significant

		plan should be developed and implemented, to avoid or reduce pollution. <i>Minor</i>		<p>impact to the environment. The operational plan as outlined in the document entitled <i>Waste & Pollution Identification, Prevention, Mitigation and Enhancement Plan</i> dated 6/8/13 was still being referred.</p> <p>However, it was found that the implementation of scheduled waste operational plan had not been consistently implemented at both the mill and estate with respect to the inventory and labelling of scheduled waste. This was raised as minor NCR MH3.</p>
	5.3.3	Evidence that crop residues / biomass are recycled (Cross ref. C 4.2). <i>Minor</i>	Yes	<p>Ribubonus Estate had continued to recycle crop residues / biomass. Pruned fronds were still being stacked in the field to decompose. PPB did not practise burning during replanting; instead palms were felled, shredded, windrowed and left to decompose in the field.</p> <p>As mentioned in the findings on indicator 4.2.3, the Ribubonus Estate had continued to carry out EFB application.</p>
C 5.4 Efficiency of energy use and use of renewable energy is maximized.	5.4.1	Monitoring of renewable energy use per tonne of CPO or palm product in the mill. <i>Minor</i>	Yes	<p>The CU had continued to monitor the renewable energy used per ton of CPO produced. In 2013, RPOM used a total of 30,762.72 MT of fibre and shell to produce 27,588.82 MT of CPO. Therefore the MT of renewal energy used per MT of CPO produced was 1.12</p> <p>For 2014, total fibre and shell used were 21,617.44 MT whilst the total CPO produced was 19,618.746 MT. Therefore thus renewable energy (MT being used per MT of CPO produced was 1.10.</p>
	5.4.2	Monitoring of direct fossil fuel use per tonne of CPO or kW per tonne palm product in the mill (or FFB where the grower has no mill). <i>Minor</i>	Yes	<p>The CU had continued to monitor the use of direct fossil fuel (diesel). The consumption of diesel by RPOM per MT of CPO was as follows: 2013 = 148,757 litre (ltr), CPO produced = 27,588.62 MT Ratio = 5.39 ltr per tonne CPO.</p> <p>2014 = 101,350 ltr, CPO produced = 19,618.746 MT Ratio = 5.17 ltr per tonne CPO.</p>
C 5.5 Use of fire for waste disposal and for preparing land for replanting is	5.5.1	No evidence of open burning. Where controlled burning occurs, it is as prescribed by	Yes	There was no evidence of open burning at Ribubonus CU

avoided except in specific situations, as identified in the ASEAN Guidance or other regional best practice.		the Environmental Quality (Declared Activities) (Open Burning) Order 2003. <i>Major</i>		
	5.5.2	Previous crop should be felled/mowed down, chipped/shredded, windrowed or pulverized/ploughed and mulched. <i>Minor</i>	Yes	The estates had continued to adhere to the policy in the AM and SSOP which advocates zero burning and that all previous crop should be felled, chipped/shredded, shredded, windrowed and left to decompose.
	5.5.3	No evidence of burning waste (including domestic waste). <i>Minor</i>	Yes	Ribubonus Estate had continued to depose domestic waste, after recyclable items like glass, plastic, tin and aluminium were removed, in landfills.
C 5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.	5.6.1	Documented plans to mitigate all polluting activities (Cross ref to C 5.1). <i>Major</i>	Yes	<u>Ribubonus Estate:</u> For the period of Jan 2013 to Dec 2013, based on GHG calculation (method: ENZO ₂), actual emission was 80.76 g CO ₂ eq/kg FFB. There was no management plan to reduce the emission as it was still within the regulated limit by the EU i.e. 123 g CO ₂ eq/kg FFB. <u>Ribubonus Mill:</u> For the same period (Jan 2013 to Dec 2013), based on GHG calculation (method: ENZO ₂) emission was 1007.83 kg CO ₂ /MT CPO against the EU regulated limit at 1,190 kg CO ₂ /MT CPO. A management plan to reduce emission was still in preparation, mainly focusing on the installation of the bio-gas plant.
	5.6.2	Plans are reviewed annually. <i>Minor</i>	Yes	Refer to 5.1.1
	5.6.3	Monitor and reduce peat subsidence rate through water table management. (Within ranges specified in C 4.3). <i>Minor</i>	Yes	Ribubonus CU has no peat soil. A soil map, prepared by Param Agricultural Soil Surveys was made available to support this.

Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
<p>C 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.</p>	6.1.1	<p>A documented social impact assessment including records of meetings. <i>Major</i></p>	Yes	<p>A Social Impact Assessment for Ribubonus CU entitled <i>Primary Report of SIA (Design Phase) for Ribubonus Oil Palm Plantations and Ribubonus Palm Oil Mill of PPB Oil Palm Berhad (Sabah)</i> which was prepared in 2009 was still being used for managing social issues. As reported in previous surveillance audits the report was prepared with the participation of the relevant stakeholders including the estate workers, governmental agencies, local businesses, panel doctors, contractors/suppliers, neighbouring local communities and smallholders.</p> <p>Ribubonus estate and the mill had continued to hold regular meetings with representatives of the local communities and oil palm smallholders to solicit feedbacks in updating the SIA Management and Action Plan as well as issues that required long-term mitigation and monitoring plans. The annual stakeholders' meeting had also enabled the CU to monitor on social issues and assess the effectiveness of mitigation measures as part of continuous improvement in handling social issues.</p>
	6.1.2	<p>Evidence that the assessment has been done with the participation of affected parties. <i>Major</i></p>	Yes	<p>The CU had continued to hold meetings and consultations with the smallholders, contractors and the nearest villagers. They were Pilayu Malusip ((Kg Gading), Jamaidi Ebik (FFB transporter), Morius Jeffrey (Kg. Gambaron), Petrus Botong (Kg. Telupid), and Jitoh Adul (Kg. Baba) participated in the SIA. The inputs from these participants were incorporated in the social management action plan.</p>
	6.1.3	<p>A timetable with responsibilities for mitigation and monitoring is reviewed and updated as necessary. <i>Minor</i></p>	Yes	<p>The SIA Management Action Plan 2014 had included a timetable with responsibilities for mitigating and monitoring. New measures and activities identified in the current year's stakeholder meeting and inputs in the complaint register had been incorporated into the action plan as part of continuous improvement in handling social issues and impacts.</p>

<p>C 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.</p>	6.2.1	<p>Documented consultation and communication procedures. <i>Major</i></p>	Yes	<p>The consultation and communication procedures as documented in <i>The Standard Operating Procedure for Consultation and Communication [Document No. RSPO 6.2(2)]</i> was still being used by the CU in handling internal and external communications.</p> <p>Internal communication was still done through morning assemblies, notice boards and posters, suggestion boxes and complaint forms. External communication had been effected mainly through mail correspondence.</p> <p>Generally, the CU had continued to abide by its procedures on internal and external communications.</p>
	6.2.2	<p>A nominated plantation management official at the operating unit responsible for these issues. <i>Minor</i></p>	Yes	<p>The Estate Manager, Mr. Jupin @ Jubin Kimbun was still responsible on matters related to communication in Ribubonus Estate. For RPOM, the Mill Manager Mr. Edward Jude was the responsible person.</p>
	6.2.3	<p>Maintenance of a list of stakeholders, records of all communication and records of actions taken in response to input from stakeholders. <i>Minor</i></p>	Yes	<p>The estates/mill had continued to maintain a list of stakeholder which comprised government agencies, contractors/suppliers (including FFB suppliers for mills), neighbouring estates and local communities. In the case of Ribubonus Estate, there were no changes on stakeholders list until 01 August 2014.</p> <p>Record on communications with outside and inside stakeholders were still being kept in the communication files in the estate/mill. Files on external communication were kept according to the agencies or parties communicated, for examples, Department of Safety and Health, and Department of Environment, and so forth. In addition, minutes of the various meetings held with internal and external stakeholders were kept for records and reference.</p>
<p>C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances,</p>	6.3.1	<p>Documentation of the process by which a dispute was resolved and the outcome. <i>Major</i></p>	Yes	<p>The CU had continued to use the <i>Dispute and Resolution Procedure (Document RSPO 2.2)</i> to resolve dispute. If the proposed solution was rejected, the dispute would be brought to third party arbitration. For land matters, procedures for resolving dispute were as prescribed in the State of Sabah Land Ordinance. PPB had established a</p>

which is implemented and accepted by all parties.				standard operating procedure on 'Grievances and Complaint (SOP-CC, Version 001).
	6.3.2	The system resolves disputes in an effective, timely and appropriate manner. <i>Minor</i>	Yes	The CU had reported that it has not had any dispute thus far. This was confirmed during interviews held with the workers. Complaints on housing from the workers had been handled quite satisfactorily by the estate/mill. Random interviews held with workers had also revealed that they were quite happy with the policies of the estates pertaining to wages, jobs, housing, water, electricity, children education and clinic services.
	6.3.3	The system is open to any affected parties. <i>Minor</i>	Yes	Ribubonus CU had continued to welcome any complaints and grievances from their stakeholders.
C 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.	6.4.1	Establishment of a procedure for identifying legal and customary rights and a procedure for identifying people entitled to compensation. <i>Major</i>	Yes	The document entitled " <i>Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation</i> " which was adopted in November 2008 was still being referred.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented. This takes into account gender differences in the power to claim rights, ownership and access to land; and long-established communities; differences in ethnic groups' proof of legal versus communal ownership of land. <i>Minor</i>	Yes	The CU had continued to use the same procedure for calculating and distributing fair compensation (monetary or otherwise). The procedure took into account gender differences in the power to claim rights, ownership and access to land; and long-established communities; differences in ethnic groups' proof of legal versus communal ownership of land.

	6.4.3	The process and outcome of any compensation claims is documented and made publicly available. <i>Minor</i>	Yes	There had been no compensation claims made against the CU.
C 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.	6.5.1	Documentation of pay and conditions. <i>Major</i>	Yes	<p>Workers who were interviewed had expressed their satisfaction with the terms of their contracts signed with the CU. Both local and foreign workers were still on the same salary scheme. The pay and conditions were clearly documented in their job contract (<i>Kontrak Pekerjaan</i>).</p> <p>The pay and conditions for employment were still in accordance to legal (Sabah Labour Ordinance) and industry standards and specified in the contract agreements with workers. The basic pay of any daily-waged worker had now been fixed at RM 30.77/day so that they would obtain the basic minimum monthly payment specified by the government. Piece-rated workers, for examples, harvesters and maintenance workers were paid based on their productivity.</p> <p>The workers interviewed had said that the terms of their contracts, payments and conditions of employment had been clearly explained to them at the time of the signing of the contract. It was still a legal requirement for an employment contract to be in a written form. (Rule 2 of Labour Rules (Sabah) 2005.).</p> <p>The pay slips o a few workers were checked and their monthly pay had conformed to the requirements of the Minimum Wages Order 2012 which specify that the basic pay should not be less than RM800.00 per month or RM30.77 per day.</p>
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for	Yes	The employment contract was still in both English and Bahasa Melayu. However, the pay slip was in English and its computations were quite complicated. The CU has already translated the pay slip into Bahasa Melayu as well as explained it to the workers. An employment contract for foreign workers had continued to state the their working hours, employee provident fund, annual leave, medical benefits and sick leave, insurance scheme, retirement, and etc.

		dismissal, period of notice, etc) are available in the language understood by the workers or explained carefully to them by a plantation management official in the operating unit. <i>Minor</i>		
	6.5.3	Growers and millers provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible (not applicable to smallholders). <i>Minor</i>	No	<p>The CU had continued to maintain its policies on housing, water and electricity supply as reported in the previous audit. Religious, medical, educational and child care facilities were still being offered free as before.</p> <p>Housing inspections were carried out by members of the health and safety committee as required by Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). A report would be presented to the main committee for information and actions, if necessary.</p> <p>Based on site visits, it was found that the environment in the line sites and houses were still in respectable conditions. However, treated water was still being connected to the rain harvesting tank and used for cooking. So far there was no evidence to show that tank water was fit for human consumption. Therefore, a minor NCR MH2 was issued.</p>
C 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	6.6.1	Documented minutes of meetings with main trade unions or workers representatives. <i>Major</i>	Yes	The estate's and mill's workers were still not members of any unions. However, the workers could channel their views or concerns to the management via the Welfare Committee whose membership comprises the workers' representatives and management of the CU. The Committee had continued to hold meetings on a regular basis during the year to discuss issues of interest to the workers and the estates/mill. The minutes of the meetings were examined during the audit.

means of independent and free association and bargaining for all such personnel.	6.6.2	A published statement in local languages recognizing freedom of association. <i>Minor</i>	Yes	The CU had continued to adhere to its policy of respecting the rights of workers to join trade unions or other forms of association as had been spelt out as one of the conditions in the workers contract document. A published statement on freedom of workers to join legal union, entitled <i>Himbauan</i> , was still being posted publicly in the estate and mill.
C 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.	6.7.1	Documented evidence that minimum age requirement is met. <i>Major</i>	Yes	The CU had continued to abide with the <i>Polisi Buruh Kanak-kanak</i> (Policy of Child Labour) prohibiting the employment of persons under the age of 18 in its recruitment of staffs and workers. The master lists of employees kept in the estate had shown that no worker below the age of 18 years was recruited since the last surveillance audit. Likewise, verifications of employment card and passports of foreign workers at the Ribubonus Estate had confirmed that all the workers were above 18, the minimum working age under Malaysian Labor Laws (Am. Act A238).
C 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.	6.8.1	A publicly available equal opportunities policy. <i>Major</i>	Yes	The equal opportunity policy was still being implemented both in the estate and mill. The policy was still being posted on notice boards for the public and workers. The terms of employment, work assignments, housing policy, medical and child care facilities were found to be non-discriminatory. Interviews held with the workers had also revealed that the CU had not discriminated against any of its staffs and workers. Foreign workers had continued to receive similar pay, stay in the same housing complex and enjoyed similar medical benefits as their local counterparts. Opportunities for employment were still open to both foreign and local workers. The composition of the management and general staff had continued to reflect the ethnic diversity of the Sabah population. There was still no restriction on the employment of women workers. They were being represented in management, staff and plantation labour force.
	6.8.2	Evidence that employees and groups including migrant	Yes	The terms of employment, work assignments, housing policy and other requirements had not been found to be discriminatory. Migrant

		workers have not been discriminated against. <i>Minor</i>		workers had continued to receive similar pay, stay in the same house, and enjoy similar medical benefits as their local counterparts.
C 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.	6.9.1	A policy on sexual harassment and violence and records of implementation. <i>Major</i>	Yes	Like any other CUs owned by PPB, the Ribubonus CU had continued to implement its Sexual Harassment Policy (<i>Polisi Gangguan Seksual</i>). Records on sexual harassment were being documented and processed in accordance with the sexual harassment policy. All cases had been settled amicably with third-party mediation by the estate's management. It was observed that the Women and Children Committee had continued to organize appropriate programmes and activities for their members such as monitoring of facilities, cleanliness and care taker at the creche' and conducted training on sexual harassment. The CU had conducted awareness talk on sexual harassment and women health on 10 May 2014.
	6.9.2	A specific grievance mechanism is established. <i>Major</i>	Yes	There was already a policy and grievance mechanism for dealing with sexual harassment, violence against women and protection of their reproductive rights had been developed. The grievance procedure which was embedded in the policy had already been tested in the CU. An interview with a complainant revealed that she had understood the procedure and that it was followed closely by the estate's management in handling her case.
C 6.10 Growers and mills deal fairly and transparently with smallholders and other local businesses.	6.10.1	Pricing mechanisms for FFB and inputs/services shall be documented. <i>Major</i>	Yes	Interviews were held with two FFB suppliers and one contractor who had been supplying FFBs to the mill. The FFB suppliers had been selling their fruits for about 5 to 10 years. The contractor and the FFB suppliers had understood the pricing mechanism as it had been spelt out in the contract.
	6.10.2	Current and past prices paid for FFB shall be publicly available. <i>Minor</i>	Yes	Ribubonus Estate has continued to publicly displayed FFB prices on notice board. The smallholders (local community) could refer to the notice board on enquiry on FFB price.
	6.10.3	Evidence that all parties understand the contractual	Yes	As mentioned earlier, the contractors interviewed did understand the terms of the contract. They had continued to be briefed him on the

		agreements they enter into, and that contracts are fair, legal and transparent. <i>Minor</i>		contents of the contract. So far, there had not been any record of complaints being filed by any contractor on any part of the contract. These contracts were written in the English and they were legal as both parties had put their signatures.
	6.10.4	Agreed payments shall be made in a timely manner. <i>Minor</i>	Yes	The FFB suppliers and contractor interviewed had also said that payment was normally made within three to four weeks after the delivery of services and this was very acceptable to them. According to them, the CU's practice was above the industry's standard.
C 6.11 Growers and millers contribute to local sustainable development wherever appropriate.	6.11.1	Demonstrable contributions to local development that are based on the results of consultation with local communities. <i>Minor</i>	Yes	<p>The Ribubonus CU had continued to contribute to local development in several ways. Owing to its close proximity, the mill had been an important source of employment and a focal point for the local communities to sell their FFBs with favourable prices.</p> <p>The estate's clinic, had also continue to extend its services to those from the surrounding villages who required a medical help. As had been previously reported the Ribubonus CU had an important contribution to the local communities through the free ferry service. In the past, the CU has also made meaningful financial contributions in various events and activities organized by the kampongs and schools, including cultural events and wedding ceremonies.</p>

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Ribubonus CU has no plan for any new planting and no new development of area was observed during the visit. Thus Principle 7 is not applicable.

Clause	Indicators	Comply Yes/No	Findings
C 7.1 A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results	7.1.1 An independent and participatory social and environmental impact assessment (SEIA) to be conducted and documented (Cross ref. to C 7.2, 7.3, 7.4, 7.5, 7.6). <i>Major compliance</i>		Not applicable

incorporated into planning, management and operations.				
	7.1.2	The results of the SEIA to be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <i>Minor compliance</i>		Not applicable
	7.1.3	Where the development includes smallholder schemes of above 500ha in total, the impacts and implications of how it is managed should be documented and a plan to manage the impacts produced. <i>Minor compliance</i>		Not applicable
C 7.2 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.	7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation should be available. <i>Major compliance</i>		Not applicable
	7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure should be available. <i>Minor compliance</i>		Not applicable
C 7.3 New plantings since November 2005, have not replaced primary forest or any area required to	7.3.1	A HCV assessment, including stakeholder consultation, is conducted prior to any conversion. <i>Major compliance</i>		Not applicable

maintain or enhance one or more High Conservation Values.	7.3.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as per Peninsular Malaysia's National Physical Plan (NPP) and Sabah Forest Management Unit under the Sabah Forest Management License Agreement. <i>Major compliance</i>		Not applicable
	7.3.3	No new plantings on floodplains (reference to be made to State DID). <i>Major compliance</i>		Not applicable
	7.3.4	Dates of land preparation and commencement are recorded. <i>Minor compliance</i>		Not applicable
C 7.4 Extensive planting (to be determined by SEIA) on steep terrain, and/or on marginal and fragile soils, is avoided.	7.4.1	All new plantings should not be cultivated on land more than 300m above sea level and on land more than 25 degrees slope unless specified by local legislation (Ref: MSGAP Part 2: OP 4.4.1.3 & 4.4.1.4) <i>Major compliance</i>		Not applicable
	7.4.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. <i>Minor compliance</i>		Not applicable

<p>C 7.5 No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>	7.5.1	<p>This activity should be integrated with SEIA required by C 7.1 <i>Major compliance</i></p>		Not applicable
<p>C 7.6 Local people are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreement.</p>	7.6.1	<p>Documented identification and assessment of legal and customary rights. <i>Major compliance</i></p>		Not applicable
	7.6.2	<p>Establishment of a system for identifying people entitled to compensation. <i>Major compliance</i></p>		Not applicable
	7.6.3	<p>This activity should be integrated with the SEIA required by C 7.1. <i>Major compliance</i></p>		Not applicable
	7.6.4	<p>Establishment of a system for calculating and distributing fair compensation (monetary or otherwise). <i>Major compliance</i></p>		Not applicable
	7.6.5	<p>The process and outcome of any compensation claims should be documented and made publicly available. <i>Major compliance</i></p>		Not applicable
	7.6.6	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>		Not applicable

		<i>Minor compliance</i>		
C 7.7 Use of fire in the preparation of new plantings is avoided other than in specific cases as identified in the ASEAN Guidance or other regional best practice.	7.7.1	No evidence of clearing by burning. This activity should be integrated with the SEIA required by C 7.1 <i>Major compliance</i>		Not applicable
	7.7.2	Evidence of approval for controlled burning, as per Environmental Quality (Declared Activities) (Open Burning) Order 2003. <i>Major compliance</i>		Not applicable

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

Clause	Indicators		Comply Yes/No	Findings
C 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. MY NIWG commits to demonstrate progressive improvement to the following but not limited to:	8.1.1	Minimise use of certain pesticides (C4.6). <i>Major</i>	Yes	Ribubonus Estate had continued to be committed to minimise the use of pesticides by continuously planting beneficial plants and reduce spraying in the inter rows by uprooting woody growths and encouraging the growth of soft weeds and <i>Neprolepis biserrata</i> .
	8.1.2	Environmental impacts (C5.1). <i>Major</i>	Yes	The mitigations measures which were prepared from the identification of environmental impacts had continued to be adequately implemented and monitored. There are plan to reduce the limit of discharge from the tertiary treatment plant by 2015.
	8.1.3	Maximizing recycling and minimizing waste or by-products generation. <i>Major</i>	Yes	The CU had continued to be active in maximizing recycling. This was evident through sales of recyclable materials such as plastic and metal. In addition, used tyres were being reused as flower pot to beautify the workers' line-sites and staff housing.
	8.1.4	Pollution prevention plans (C5.6). <i>Major</i>	Yes	PPB had set up two units of bio-gas plant at two of its POMs. This would be followed by another POM later on. There was plan on GHG emission reduction which would be implemented in phases.

	8.1.5	Social impacts (C6.1). <i>Major</i>	Yes	<p>The CU had continued to implement the <i>Continuous Improvement Plan</i>. The activities that were directed at improving areas of key operations had been carried out and recorded in a brief table-form in the file on Principle 8. A periodic review on the progress of the implementation of the action plan was done and record was kept which would serve as a management tool for continuous improvement.</p> <p>A major improvement on the social aspects was the replacement of almost all of the old wooden quarters with new Class H labour lines. Every unit of the labour line had been equipped with electricity and treated water supply. Larger tanks for rain water storage were also added to each unit. Proper sanitation facilities with sewage treatment had also been provided.</p> <p>Other improvements in the social aspects include the following:</p> <ol style="list-style-type: none"> 1. Job employment opportunities in estate and mill for local communities. 2. Maintenance of access road for the local community. 3. School bus provided for children of staffs and workers. 4. Standby transport for emergency cases from Ribubonus CU to external clinic/hospital
	8.1.6	A mechanism to capture the performance and expenditure in social and environmental aspects. <i>Minor</i>	Yes	A mechanism to capture the performance in social aspects (Social Management Plan and Community Development Plan) had been well established. In terms of expenditure, Ribubonus Estate has spent about RM396,865 for welfare, RM61,709 for education (Humana school) and RM1,746,346 for workers quarters, mosque (surau) and chapel.

RSPO Supply Chain at RPOM – Module E - Mass Balance Model

Item No	Requirement	Findings
E.1 E.1.1	Documented procedures	<u>E.1.1.a</u>

E.1.2	<p>The facility shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard.</p> <p>The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Ribubonus Mill has a documented procedure (SOP), 'Supply Chain and Traceability (Mass Balance Model) Rev:3 dated 20/2/2014, describing the implementation of the elements in the supply chain system.</p> <p>The revised SOP has included the procedures on the identification of (certified and non certified) FFB, CPO and PK.</p> <p><u>E.1.1.b</u> Mr. Edward Jude was still the RSPO Management Representative (MR).</p> <p><u>E.1.2</u> The procedures on receiving and processing of certified and non-certified FFBs were described in Section 1.5a) of the SOP.</p>
<p>E.2</p> <p>E.2.1</p> <p>E.2.2</p>	<p>Purchasing and goods in</p> <p>The facility shall verify and document the volumes of certified and non-certified FFBs received.</p> <p>The facility shall inform the CB immediately if there is a projected overproduction.</p>	<p><u>E.2.1</u></p> <p>Jul 13 – June 14 : Certified FFB – 78,571.24 MT Non-certified FFB – 57,729.74 MT Total : 136,300.98 MT</p>
<p>E.3</p> <p>E.3.1</p> <p>E.3.2</p>	<p>Record keeping</p> <p>The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements.</p> <p>Retention times for all records and reports shall be at least five (5) years.</p>	<p><u>E.3.1</u></p> <p>RPOM had maintained an up-to-date and accessible records. The following records were sighted during the audit:</p> <ul style="list-style-type: none"> • Training records • Incoming FFB • Outgoing of CPO and PK records • Production records <p>For production, the palm kernel stock volume in the kernel silos was measured by using a sounding tape. Reading from the sounding tape would be converted to MT by referring to the “sounding table” which had been developed by a team in the company</p> <p><u>E.3.2</u></p>

<p>E.3.3</p> <p>E.3.4</p> <p>E.3.5</p>	<p>a) The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The facility can only deliver Mass Balance sales from a positive stock. However, a facility is allowed to sell short.</p> <p>The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/MB or Mass Balance. The supply chain model used should be clearly indicated.</p> <p>In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.</p>	<p>All record and report regarding RSPO SCCS will be kept for 5 years (Item 23.5 (d) of the company's SOP).</p> <p>E.3.3 Ribubonus had prepared "Quarterly Report of Incoming Sustainable Raw Material 2013" to monitor the quantity of incoming certified FFBs. The report was sighted and found to be adequate.</p> <p>E.3.4 Product names and model used were clearly stated on the relevant documents such as sales contract, delivery order and weighbridge ticket.</p> <p>E.3.5 Not applicable – no outsource activity.</p>
<p>E.4</p> <p>E.4.1</p>	<p>Sales and good out</p> <p>The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:</p> <p>a) The name and address of the buyer;</p> <p>b) The date on which the invoice was issued;</p> <p>c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)</p> <p>d) The quantity of the products delivered;</p> <p>e) Reference to related transport documentation.</p>	<p>Accompanying documents for delivering certified palm oil products were:</p> <ol style="list-style-type: none"> 1) weighbridge ticket (e.g. 186616) 2) delivery order (e.g. 2426 – this no. is referred in the weighbridge ticket), in addition, the seal nos. was also stated in both DO and weighbridge ticket. <p>All goods (CPO and PK) would be sent to the Sandakan Edible Oil Sdn Bhd only (part of Willmar/PPB group) for further processing.</p> <p>Invoice (sampled #7627101869) issued has the following information:</p> <ul style="list-style-type: none"> • Name of buyer – Sandakan Edible Oil Sdn Bhd • Address – Km 8, Jln Batu Sapi Karamunting, 90729 Sandakan • Description of products – CSPK/MB was stamped in DO and weighbridge ticket only, not in the invoice • Quantity – 153.66 MT • DO number – available • Contract no. – yes, e.g. SEO/36P1405/0106L & SEO/36P1406/0134L

		<ul style="list-style-type: none"> Contract date – 24/06/14
E.5	Training	
E.5.1	The facility shall provide training for all staff as required to implement the requirements of the Supply Chain Certification Systems.	<p>Latest training was conducted on 21/3/2014 by Hanib Libon [Sustainability Dept., EMU (Sandakan)] on “ISCC & RSPO Awareness Training” and was attended by RPOM’s staff.</p> <p>Attendance list was sighted. Based on training materials, the training was found to be covering most on aspects related to the implementation of the RSPO supply chain ststem.</p>
E.6	Claims	
E.6.1	The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims.	RPOM had sold MB PK but had not made announcement in the RSPO eTrace as PK has not yet been included in the e-trace system.

3.2 Identified Non-Conformities

Details of the non-conformities, corrective actions taken by Ribubonus CU and assessors' verification of the corrective actions taken are as in **Appendix 3**. All nonconformities have been closed out.

3.3 Status of Non-conformities Previously Identified

The effectiveness of the corrective actions taken by the CU to address the previous nonconformities had been verified by the assessors. The assessors were satisfied that the corrective actions have been adequate to address the non-conformities and had therefore closed them out. The details of the verified nonconformities are as in **Attachment 4**.

3.4 Issues Raised by Stakeholders

There were various stakeholders interviewed during this surveillance comprising the workers, surrounding villagers and contractors. Generally, all of the stakeholders had given positive feedbacks on the Ribubonus CU.

3.5 Noteworthy Positive and Negative Observation

The level of awareness among the workers on the implementation of activities related to the requirements of the RSPO P&C was found to have improved further. The CU had also continued to make further progress on their compliance against the requirements of the RSPO P&C. In terms of the social aspects, the new workers housing complex (type H) had just been completed with the other amenities such as a crèche and worship places for both Muslim and Christian workers.

4.0 CERTIFIED ORGANIZATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

Formal Sign-off of Surveillance Assessment Findings

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

Name : Mohamed Hidhir bin Zainal Abidin

Signature :



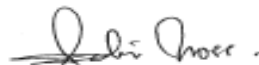
Designation : Lead Assessor

Date : 09/01/2015

I, the undersigned, representing **Ribubonus Certification Unit** acknowledge and confirm the contents of the assessment report and findings of the assessment.

Name : Edrin Moss

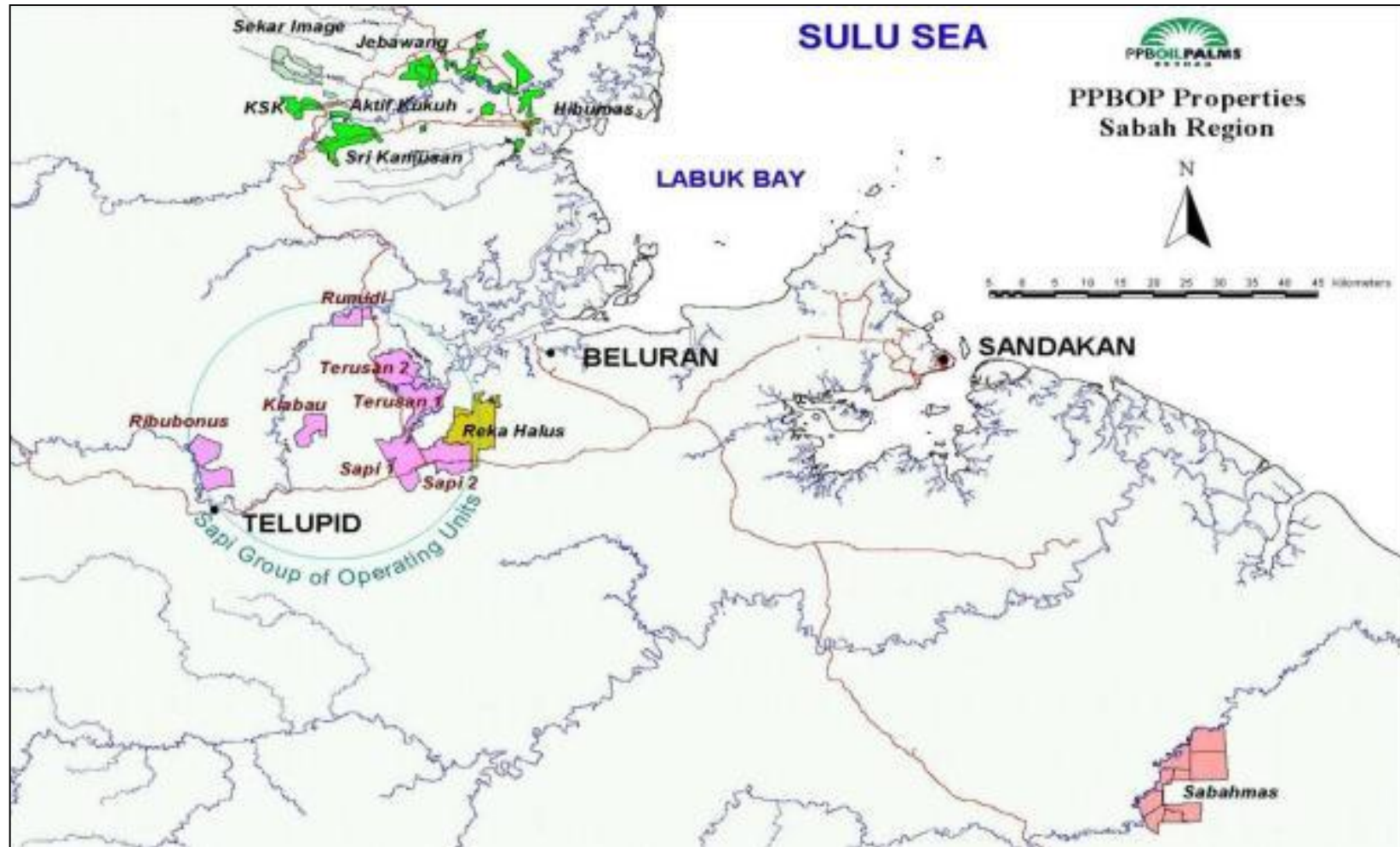
Signature :



Designation : Senior Manager - Sustainability

Date : 19th January 2015

Location Map of Ribubonus CU



Assessment Programme

Day 1: 27/8/14 (Wednesday)

Activities /areas to be visited	Hidhir	Selvasingam	Razman	Auditee
0800-0830	Opening Meeting, audit team introduction and briefing on audit objectives, scope, methodology, criteria and programmes by audit team leader at Ribubonus Estate			Top mgmt & Committee Member
0830-0845	Briefing on the organization implementation of RSPO (including action taken to address main assessment findings) and update on time bound plan progress			Management Representative
0845-0900	Review of documentation against requirements of RSPO P&C MYNI: 2008 and RSPO Supply Chain Standard (November 2011). Review of actions taken on nonconformities identified during the previous audit			
0900-1300	<p>Site visit and assessment at Ribubonus POM relating to Good Milling Practices, environmental aspects and management plan and implementation of occupational safety and health</p> <ul style="list-style-type: none"> • Loading Ramp • Production area • Utilities e.g. engine room, boiler, WTP and ETP etc. • Laboratory • Workshop • Management of contractors • Interview with safety and health committee • Safety and health plan • Waste mangement (hazardous, domestic and biomass waste) • Pollution prevention plan • Energy and water consumption • Water management plan • Commitment to transparency • Laws and regulations • Commitment to long-term economic and financial viability • Continuous Improvement Plan 	<p>Site visit and assessment at Ribubonus Estate relating to Good Agricultural Practice including IPM and implementation of occupational safety and health</p> <ul style="list-style-type: none"> • Replanting area • Nursery (if any) • Good Agricultural Practice • Witness activities & assessment at site (weeding/ spraying/ harvesting/ other maintenance activities) and implementation of occupational safety and health • Emergency preparedness & response on site • IPM programme • EFB mulching • Soil erosion management • Commitment to transparency • Laws and regulations • Commitment to long-term economic and financial viability • Continuous Improvement Plan • Verification of previous audit finding 	<p>Site visit and assessment at Ribubonus Estate relating to estates boundary, HCV, and management plans</p> <ul style="list-style-type: none"> • Conservation area management • Riparian Buffer Zone • Water bodies and river system • Plantation on hilly and swampy area • Consultation with relevant government agencies, if applicable • Commitment to transparency • Verification of land title and boundary stone • Laws and regulations • Commitment to long-term economic and financial viability • Continuous Improvement Plan • Verification of previous audit finding <p>Assessment on related Indicators of P1, P2,P3, P4, P5, P8</p>	Guide/PIC

	<ul style="list-style-type: none"> Verification of previous audit finding Assessment on related Indicators of P1, P2, P3, P4, P5, P8	Assessment on related Indicators of P1,P2,P3, P4, P5, P8		
1300-1400	Lunch Break			
1400-1700	Continue assessment	Continue assessment	Continue assessment	Relevant PIC
1700	End of day 1			

Day 2: (28/8/4) Thursday

Activities /areas to be visited	Hidhir	Selvasingam	Razman	Auditee
0800-1300	<p>Site visit and assessment at Ribubonus Estate relating to environmental aspects and management plan</p> <ul style="list-style-type: none"> • Water bodies • River system • Soil erosion management • Interview with stakeholders and relevant government agencies, if applicable • Interview with estate hospital assistant • Waste management at field and line site including scheduled wastes • Estate facilities such as agrochemical store, workshop, generator set, clinic, etc. • Commitment to transparency • Laws and regulations • Commitment to long-term economic and financial viability • Continuous Improvement Plan <p>Assessment on related Indicators of P1, P2,P3, P4, P5, P8</p>	Continue assessment at Ribubonus Estate	<p>Site visit and assessment at Ribubonus Estate relating to, local community, indigenous peoples and workers issues. Verification of SIA and management plans</p> <ul style="list-style-type: none"> • Interviews with Administration staff, Gender Committee, Union representatives (if any) and FFB transporters. • Discussion with management (CSR, community affairs) • Consultation with relevant government agencies, if applicable • Facilities at workplace (rest area etc) • Visit line site and discussion with Workers and dependents • Facilities at living quarters (surau, provision shop, crèche, etc) • Visit and discussion with surrounding local community and contractors • Continuous Improvement Plan • Verification of previous audit finding <p>Assessment on related Indicators of P1, P2, P3, P6 & P8</p>	Guide/PIC
1200-1300	Lunch Break			
1300-1700	Continue with unfinished element			
1700	End of day 2			

Day 3: 29/8/14 (Friday)

Activities /areas to be visited	Hidhir	Selvasingam	Razman	Auditee
0800-1300	Site visit and assessment at Ribubonus POM relating to Supply Chain implementation including the model use <ul style="list-style-type: none"> • General Chain of Custody System Requirements for the supply chain • Documented procedures • Purchasing and goods in • Outsourcing activity • Sales and goods out • Processing • Records keeping • Registration • Training • Claims • Mass balance accounting 	Continue assessment at Ribubonus Estate	Site visit and assessment at Ribubonus POM on responsible social considerations <ul style="list-style-type: none"> • Interviews with Administration staff , Gender Committee, FFB Suppliers, contractors and Union representatives • Discussion with management (CSR, community affairs) • SIA and management plan • Facilities at workplace • Consultation with relevant government agencies (if applicable) • Pricing mechanism of FFB • Continuous Improvement Plan • Other areas identified during the assessment Assessment on related indicators of P1, P2, P3, P6, P8	Guide/PIC
1200-1330	Lunch Break & Friday Prayer			
1330-1430	Verification on outstanding issues for Ribubonus CU			Guide/PIC
1430-1530	Audit Team discussion, preparation on audit findings and issuance of NCR (if any)			Audit team member
1530-1700	Closing meeting at Ribubonus Estate – presentation of Ribubonus Certification Unit assessment findings			Top mgmt & Committee Member
1700	End of assessment - travelling back to Sandakan			

DETAIL OF NON-CONFORMITY AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken	Verification by Assessor
Indicator 2.1.1 :	Major NCR # MH1	<p>Indicator 2.1.1 : Evidence of compliance with legal requirements Noise Exposure Regulation 1989 – Regulation 22 (b) :</p> <p>Frequency of audiometric testing (hearing impairment and Standard Threshold Shift) on annual basis Finding: The above requirement was not being fulfilled</p> <p>Objective evidences: List of workers for annual audiometric testing in 2013 and 2014 had failed to include :</p> <ul style="list-style-type: none"> i) 2 workers (production supervisor & oil room operator) who have hearing impairment based on 2012 report. ii) 2 workers (security and oil room operator) who have hearing impairment based on 2013 report 	<p>Immediate actions done by Ribubonus Mill:</p> <ul style="list-style-type: none"> a) Report of the audiometric testing for Mr Jawhalal to be sent to the lead auditor as a prove that the audiometric test has been conducted b) Audiometric testing for Mr Arip and Mr Dursin had been conducted on 5 September 2014. <p>Corrective actions taken by EMU:</p> <ul style="list-style-type: none"> a) ESH officer to check all audiometric record and result making sure that no relevant workers slip out from the hearing conservation program. b) Hearing conservation program had been conducted for those with hearing impairment. 	<p>Verified audiometric report for the said person in July 2014.</p> <p>Audiometric test was carried out recently in September 2014. Verified report for both exposed workers.</p> <p>Status of the affected workers would be verified in the next audit.</p> <p>Refer to notification email by Senior Manager Sustainability pertaining to safety and health programme.</p> <p>Effectiveness of corrective action taken would be verified in the next audit.</p>
Indicator : 6.5.3	Minor NCR # MH2	<p>Growers and millers provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible (not applicable to smallholders). Finding: The above requirement was not being adhered to.</p> <p>Objective evidence:</p> <ul style="list-style-type: none"> i) Based on interview with workers, treated water (from WTP) was connected to rain water harvesting tank and used for cooking. 	<p>Corrective actions taken by Ribubonus CU:</p> <ul style="list-style-type: none"> a) A water quality test would be conducted to determine if the water supply is fit for consumption. Completion date by November 2014 b) An awareness program would be conducted for all workers where water supply to be boiled before drinking. Completion Date by October 2014. 	<p>Corrective actions taken would be verified in the next audit.</p>

		No evidence to show that the tank water was fit for human consumption.			
Indicator 5.3.2	Minor #MH3	NCR	<p>Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid and reduce pollution.</p> <p>Finding: Scheduled waste operational plan was not consistently implemented at Ribubonus Mill and estate.</p> <p>Objective evidences:</p> <p>Ribubonus Mill</p> <ul style="list-style-type: none"> i) Labelling for SW409 was not placed on the container. Name of waste and date of first generation cannot be verified. ii) 5th Schedule (inventory) was not accurate recorded for SW109, SW410 and SW429 based on July 2014 inventory. <p>Ribubonus Estate</p> <ul style="list-style-type: none"> i) Labelling of schedule waste (solid and liquid) has to be in accordance with 3rd Schedule. ii) Waste generation was sighted on site, however, it was not updated in the inventory. For example SW 410 & SW305 	<p>Corrective actions taken by Ribubonus CU:</p> <ul style="list-style-type: none"> a) New standard label will be order and place at correct storage container. Date of completion by October 2014. b) Updating of all schedule waste record and 5th Schedule. Date of completion by October 2014. c) ES & H officer will be sent for Scheduled Waste Manager training by November 2014. 	<p>Corrective actions taken would be verified in the next audit.</p>

Status of Previous Non-Conformities

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken	Verification by Assessor
Indicator 2.1.1	Major	<p>Ribubonus Mill has yet to comply with:</p> <ul style="list-style-type: none"> a) Jadual Pematuhan Kilang (No. Lesen: 001854) with reference to requirement of competent person responsible for effluent treatment system in the mill. b) During the audit day, there was no competent person –in-charge for electrical installation to replace grade A1 chargineman who has resigned in March 2013. c) During the audit, there was no competent person-in-charge for Internal Combustion Engine (ICE) <p>Ribubonus estate yet to comply with</p> <ul style="list-style-type: none"> a) No evidence of DOE approval to transport scheduled wastes i.e. clinical waste to Sapi estate. b) No evidence of DOE approval for installation of diesel generator set. c) During the audit, no competent person-in-charge for generator set i.e. 2nd grade Internal Combustion Engine (ICE) 	<p>Ribubonus Mill has taken the following actions:</p> <ul style="list-style-type: none"> a) Name & qualification of competent person responsible for effluent treatment plant was made available and document has been submitted to the Department of Environment (DOE) b) A grade A1 chargineman was made available i.e. Mr. Mohd Khairul Syafiq and the mill had also submitted application to DOSH for another candidate to sit for the examination of grade A1 chargineman. c) A grade 2 ICE had sat for Grade 1 ICE exam on 17 May 2012 but failed. An application was sent to the DOSH for a candidate from the mill as ICE competent person. An advertisement in the local newspaper to recruit ICE competent person. <p>Ribubonus estate has taken the following actions:</p> <ul style="list-style-type: none"> a) Letter was submitted to the DOE on 1 August 2013 to apply special management of clinical waste. Justification on special waste management was also included in the letter. b) A consultant was appointed to obtain written approval from DOE on the diesel generator set. Application for Diesel Generator set Written approval to DOE c) Application to Department of Occupational Safety & Health (DOSH) to send the candidates for ICE competent 	<ul style="list-style-type: none"> a) Mill manager, Mr Edward Jude had attended the CePPOM in January 2014 b) Mohd KHAIRUL Syafiq A1 chargineman, in charge had registered with the Suruhanjaya Tenaga. c) The candidates had failed the exam. Resitting on August 2014 and waiting for the results. PPBOP management has consult DOSH pertaining to the competent person issues. Decision by DOSH to be verified in the next audit. <p>Sighted approval letter from DOE for special management of waste fpr SW 404. DOE letter dated 11/2/14 was sighted.</p>

			person. The advertisement in local newspaper to recruit ICE competent person.	Still in progress. All required information has been submitted by consultant. Waiting for DOE approval. To be verified in the next audit. Competent person will be transferred from Ribubonus Mill. Non competent driver would sit for examination.
Indicator 4.7.1	Major	There was inadequate coverage of risk assessment for the following activities: a) Discharge of steam and condensate from the boiler and power house into the nearby open drain. b) Uncovered drain near to mill compound (monsoon drain, steam condensate & sludge drain) c) Confined space hazard while doing maintenance at ferry hull.	Documented risk assessment was conducted for the activities (a), (b) & (c) on 1 August 2013. Document was submitted to audit team.	Updated HIRADC was sighted. Document dated 19/8/14 was referred to.
Indicator 4.8.1	Major	Training needs for the employees was not comprehensively implemented for the following: a) Emergency and first aid training b) MSDS interpretation training c) USECHH 2000 training d) Safety and Health Committee roles & responsibility training e) Safety and Health Committee incident investigation training f) Road safety training	Training needs was established for 2013 & 2014 and included all the training related to subject (a) to (f). Relevant training was conducted accordingly.	The respective training records were sighted for 2014: SHC training: 9-10/1/14 MSDS & USECHH 2000 training – 22/4/14 First Aid Training – 9/6/14 SHC incident investigation: 11-to 12/3/14 Road safety: 22/4/14
Indicator 5.6.1	Major	No documented plans to mitigate all polluting activities established for 2013.	Documented plan namely “Waste & Pollution - identification , prevention, mitigation & enhancement plan “ was established dated 1 August 2013.	Waste management plan has been updated. Waste & Pollution – identification, prevention, mitigation &

				enhancement dated 1/7/14 sighted.	plan was
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