



**PUBLIC SUMMARY
FOURTH SURVEILLANCE ASSESSMENT**

**IOI CORPORATION BERHAD
BUKIT LEELAU CERTIFICATION UNIT**

Muadzam Shah, Pahang, Malaysia

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30 January 2015

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SUMMARY

This public certification summary provides the general information on the Bukit Leelau Certification Unit (Bukit Leelau CU) of the IOI Corporation Berhad, 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 Bukit Leelau CU was conducted on 8-12 September 2014. SIRIM QAS International Sdn Bhd (SIRIM QAS International) was contracted by IOI 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 Bukit Leelau CU has resulted in the issuance of five (5) major Non-Conformity Reports (NCRs) which two of them were upgraded from minor NCR in the previous assessment. The Bukit Leelau CU has taken corrective actions to address the major NCR which have been verified by the assessor and therefore closed out. The Bukit Leelau 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 Bukit Leelau 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 Bukit Leelau CU to maintain its certification against the RSPO MY-NI: 2010.

1.0 Scope of Assessment

1.1 National Intreptation Used

The operations of the Bukit Leelau Palm Oil Mill (BLPOM) 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 Segregation (MB) module of the RSPO Supply Chain Standard, November 2011.

1.2 Certification Scope

The scope of certification is the sustainable production of crude palm oil and palm kernel using the Segregation (SG) model.

1.3 Location of Mill and Supply Base

Bukit Leelau CU covers one palm oil mill and six oil palm estates, all located at Muadzam Shah, Pahang, Malaysia. The locations and area details of the mill and estates are shown in Table 1.

Table 1: Location Coordinates and Area of Bukit Leelau CU (Mill and Estates)

Mill / supply bases	GPS Location		Location Address
	Latitude	Longitude	
Bukit Leelau Palm Oil Mill	03°18'00" N	103°08'24" E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia
Bukit Leelau Estate	03°18'00" N	103°07'48" E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia
Merchong Estate	03°01'12" N	103°12'00" E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia
Mekassar Estate	02°59'24" N	103°10'12" E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia
Detas Estate	03°33'00" N	103°03'00" E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia
Manna Enterprise	03°18.667' N	103°07.797' E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia
Ladang Hj Harun	03°18.841' N	103°07.945' E	KM 75 Kuantan-Segamat Highway, Muadzam Shah, Pahang, Malaysia

The location map of the CU is shown as in Attachment 1.

1.4 Description of Supply Base (Fruit Sources)

Details of the FFB contribution from each supply bases.

Table 2: Certified Plantation Area

Operating Unit	Year of establishment	Certified Area (Ha)
Bukit Leelau Estate	1989	2,069.00
Detas Estate	1983	2,403.70
Merchong Estate	1978	1,619.90
Mekassar Estate	1978	2,300.70
Manna Enterprise	1990	60.56
Ladang Hj. Harun	1990	60.88
	Total	8,514.74

Table 3: Actual FFB contribution by each Estate and other sources to Bukit Leelau POM (September 2013 to August 2014)

Operating Unit	FFB Contribution	
	MT	%
Bukit Leelau Estate	43,241.44	28.68
Detas Estate	35,354.91	23.45
Mekassar Estate	25,632.53	17.00
Merchong Estate	40,366.80	26.78
Ladang Manna Estate	11.91	0.01
Hj. Harun Estate	107.90	0.07
Leepang A Estate	3,621.93	2.40
Laukin A Estate	2,064.01	1.37
*Bebat Estate (Boustead)	351.98	0.23
Outsiders (non-certified)	0	0
Total	150,753.41	100

**Certified by SGS*

Table 4: Projected FFB Contribution by each Estate and other sources to Bukit Leelau POM (September 2014 to August 2015)

Operating Unit	FFB Contribution	
	MT	%
Bukit Leelau Estate	45,340	28.56
Detas Estate	31,850	20.07
Mekassar Estate	30,460	19.19
Merchong Estate	50,240	31.65
Ladang Manna Estate	600	0.38
Hj. Harun Estate	240	0.15
Outsiders (non-certified)	0	0.00
Total	158,730	100.00

1.5 Date of Planting and Cycle (Planted Area)

The dates of planting and age profiles for each supply bases under Bukit Leelau CU are detailed in the following table 4.

Table 5: Year of Establishment & area planted with Oil Palm in Bukit Leelau Estate CU.

Operating Unit	Year of Establishment	Planted Area (ha)
Bukit Leelau Estate	1989	1,976.00
Leepang A Estate	2001	1,823.00

Laukin A Estate	2002	1,051.00
Detas Estate	1983	2,177.00
Merchong Estate	1978	1,793.00
Mekassar Estate	1978	1,132.00
Ladang Manna	1990	60.56
Ladang Hj Harun	1990	60.88
Total		10,073.44

1.6 Other Certification Held

The BLPOM and all Estates do not hold any other form of third-party certification of their management systems

1.7 Organisational Information/Contact Person(s)

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1.8 Time Bound Plan for other Management Units

No.	Certification Unit	Location	Plan to be certified	Status	Certification Body	Remarks
1.	Pamol Sabah	Sandakan, Sabah, Malaysia	May 2008	Certified on 18/03/2010	SGS Malaysia	Planned for fourth Surveillance Assessment in January 2014
2.	Sakilan POM	Sandakan, Sabah		Certified on 8/3/2010	BSI Malaysia	
3.	Pamol Kluang	Kluang, Johor, Malaysia	March 2009	Certified on 16 March 2010	BSI Malaysia	Planned for fourth Surveillance Assessment in January 2014
4.	Gomali	Batu Anam, Segamat, Johor, Malaysia	August 2009	Certified on 23 August 2010	SGS Malaysia	Planned for fourth Surveillance Assessment in June 2014
5.	Baturong	Tawau, Sabah, Malaysia	September 2009	Certified on 08 October 2010	SGS Malaysia	Planned for fourth Surveillance Assessment in August 2014
6.	Bukit Leelau	Muadzam Shah, Pahang, Malaysia	June 2010	Certified on 19 November 2010	SIRIM QAS International Sdn. Bhd.	Planned for third Surveillance Assessment in September 2013
7.	Mayvin	Sandakan, Sabah, Malaysia	August 2010	Certified on 22 December 2010	Moody International	Planned for third Surveillance Assessment in October 2013

8.	Pukin	Keratong, Rompin, Pahang, Malaysia	December 2010	Certified on 13 June 2012	Moody International	Planned for third Surveillance Assessment in April 2014
9.	Leepang	Lahad Datu, Sabah, Malaysia	August 2012	Pending to be certified	SGS Malaysia	
10.	Syarimo	Lahad Datu, Sabah, Malaysia	September 2012	Certified on 20 March 2013	Moody International	Planned for first Surveillance Assessment in January 2014
11.	Ladang Sabah	Sandakan, Sabah, Malaysia	October 2012	Certified on 03 April 2013	Moody International	Planned for first Surveillance Assessment in February 2014
12.	Morisem	Lahad Datu, Sabah, Malaysia	September 2013	Certified on 18/12/2013	Intertek Certification	
13.	IOI-Pelita	Miri, Sarawak, Malaysia	June 2014	Audit date depending on uplifting of suspension by RSPO	N.A.	N.A.
14.	PT Sukses Karya Sawit, PT Berkat Nabati Sejahtera, PT Bumi Sawit Sejahtera	Ketapang, Kalimantan, Indonesia.	2016	NA	NA	No palm oil mill yet
15.	Unico-Desa	Lahad Datu, Sabah, Malaysia	2016	NA	NA	Acquired in end of 2013

1.8 Tonnages Certified

Table 6: Actual FFB received and CPO & PK dispatch by Bukit Leelau POM (September 2013 to August 2014)

	Total (MT)
FFB Received	150,753.41
FFB Processed	150,753.41
CPO Production	32,093.44
PK Production	7,973.93
Certified CPO sold as Segregation	4,000.00
Certified PK sold Mass Segregation	0.00
CPO sold as non-RSPO certified	0.00
PK sold as non-RSPO certified	8,216.67

Table 7: Projected FFB received and CPO & PK dispatch by Bukit Leelau POM (September 2014 – August 2015)

	Total (MT)
FFB Received	158,730.00
FFB Processed	158,730.00
CPO Production	32,940.00
PK Production	8,729.00
Certified CPO to be sold as Segregation	32,940.00
Certified PK to be sold Segregation	10,500.00
CPO to be sold as non-certified	0.00
PK to be sold as non-certified	8,729.00

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

IOI Corporation Berhad has appointed two officers from the Sustainability Department as a Group Manager who responsible to ensure the smallholder conformance against RSPO standard requirements. For this assessment, the two smallholders namely Ladang Manna and Ladang Hj. Harun were also included in the assessment sampling

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 (UNFCC). 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 four assessors. The details of the assessors and their qualification are detailed below:

Member of the Assessment Team	Role/area of RSPO requirements	Qualifications
Valence Shem	Assessment Team Leader / Supply Chain and environmental issues	<ul style="list-style-type: none"> Collected more than 500 auditor days in auditing various schemes i.e. ISO 14001, RSPO P&C and RSPO Supply Chain Nine years' experience in Oil Palm Plantation management Successfully completed IEMA accredited Lead Assessor training for ISO 14001: 2004 B.Tech. (Hons) Industrial Technology Successfully completed and passed the RSPO Lead Assessor Course in 2011. Successfully completed IRCA accredited Lead Assessor training for ISO 9001: 2008
Khairul Najwan Ahmad Jahari	Assessor / HCV habitats & ecology	<ul style="list-style-type: none"> 7 years' experience in Forest related areas as a researcher with FRIM since 2003 32 man-days in auditing MC&I(2002) as forest auditor Attended Auditor Training Course on Malaysian Criteria and Indicators for Forest Management Certification [MC&I(2002)] organized by MTCC, April 2009. Attended Auditor Training Course on Malaysian Criteria and Indicators for Forest Plantation Certification [MC&I(2002)] organized by MTCC 2010. Attended a training on RSPO P & C and certification requirements in January 2011 Successfully passed EMS 14001: 2004 Lead Auditor Course, March 2009. Successfully passed OHSAS 18001: 2007 Lead Auditor Course, Feb 2009. Successfully passed QMS 9001: 2008 Lead Auditor Course, Feb 2009. B.Sc. of Forestry (Forest Management) M Sc Environmental (GIS Remote Sensing, still pursuing) Successfully completed and passed the RSPO Lead Assessor Course in 2011.
Mohamed Hidir Bin Zainal Abidin	Lead Assessor / Milling Operation, Occupational Health and Safety	<ul style="list-style-type: none"> Over 100 days of auditing experience, having audited on: ISO 9001, ISO 14001, & RSPO. 4 years' experience in palm oil milling Successfully Completed RSPO Lead Assessor Course - 2013 Successfully completed ISO 14001 EMS RABQSA/IRCA approved Lead Assessor - 2012 Successfully completed ISO 9001 QMS RABQSA/IRCA approved Lead Assessor – 2012 Successfully completed OHSAS 18001 OHSMS RABQSA/IRCA accredited Lead Assessor Course – 2012 B.Sc. (Hons) Chemical Engineering

Dr. Zahid Emby	Assessor / workers & community issues and related legal issues	<ul style="list-style-type: none"> • 1977- 1992 – Lecturer, Department of Social Sciences, Faculty of Educational Services, Universiti Pertanian Malaysia • Head, August 1992 – 1994, Department of Social Development Studies, Universiti Pertanian Malaysia • August 1, 1998 -2001. Reappointed as Head of the renamed Department of Social and Development Science for a three year term • Head, Department of Music from October 2003 until his retirement on December 17, 2006 • Spent some time as a visiting scholar at University of Hull, U.K. and Victoria University of Wellington, New Zealand. • Freelance consultant on social issues
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2.3 Assessment Methodology and Programme

The planning for this surveillance assessment was guided according to the RSPO Annual Surveillance Assessment Document. The surveillance assessment was guided by the sampling formula of 0.8 v_y. However, after studying the document of previous assessment, it was decided that the sampling formula of 0.8v_y to determine the number of supply bases to be audited would not be used as each supplying base selected has its own issues related to the requirements of the RSPO MYNI. Each of the sites were assessed, namely Bukit Leelau oil mill, Bukit Leelau estate, Detas estate, Merchong estate, Mekassar estates and smallholders i.e. Ladang Manna Enterprise and Ladang Hj. Harun.

The assessment team carried out field and office assessments for conformance against the RSPO-MY principles and criteria. The visit has covered mill operation, estate agriculture practice, HCV habitats, labour lines, chemical storage areas and other workplaces.

Common systems were identified and specific evidences were recorded for individual estates as well as smallholders. Interviews, particularly those with employees, local communities and suppliers were conducted formally as well as informally, without the presence of company management personnel. In addition to that, related records and documentation were inspected.

Detail of area coverage during this assessment is highlighted in the surveillance assessment programme refer Attachment 2.

2.4 Stakeholder Consultation and List of Stakeholders Contacted

There were various stakeholders interviewed during this assessment comprising of workers, surrounding villagers and contractors. Generally, all of the stakeholders had given positive feedback towards Bukit Leelau CU.

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 the third Annual Surveillance Assessment were presented during the on-site closing meeting. There were five major nonconformity reports (NCR) being raised on the Bukit Leelau CU's compliance against the requirements of the RSPO MY-NI which two of them were upgraded from minor NCR in the previous assessment.

The detailed findings of the assessment on the CU's compliance with the requirements of the RPSO MYNI 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	<p>All requests and/or complaints/suggestions from internal and external stakeholders related to social, cultural and economic issues and the responses to these requests/complaints/suggestions are recorded in Grievance/Complaints Book (also known as the Green Book).</p> <p><u>Bkt Leelau Estate</u></p> <ul style="list-style-type: none"> i) DOSH visit for 2014 on inspection and enforcement of Occupational, Safety and Health for Veterinary Sector on 2/9/14. Comments on the buffalo assisted harvesting <ul style="list-style-type: none"> • To do HIRARC or risk assessment of the related activities. • SOP to be established for blood sampling test (detection of diseases such as TIBI) and FMD vaccination • Annual inspection of unfired pressure vessel (UPV). Machine is fully operational and all necessary comments were acted upon. ii) Veterinary Department visit on vaccination programme. Latest visit was on 24/7/14. <p><u>Bkt Leelau POM</u></p> <ul style="list-style-type: none"> i) Ministry of health paid a visit on drinking water quality sampling ii) DOSH paid visits on routine inspection iii) Stakeholders meeting conducted on 27 August 2014 showed there is no request from stakeholders to review the information
C 1.2	1.2.1	Land titles / user rights (C	Yes	Publicly available. Cross refer to Criterion 2.2.

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. Documents that must be publicly available include, but are not necessarily limited to:-		2.2)		
	1.2.2	Safety and health plan (C 4.7)	Yes	Publicly available. Cross refer to Indicator 4.7.1.
	1.2.3	Plans and impact assessments relating to environmental and social impacts (C 5.1, 6.1, 7.1, 7.3)	Yes	Publicly available. Cross refer to Criterion 5.1 and 6.1.
	1.2.4	Pollution prevention plans (C 5.6)	Yes	Publicly available. Cross refer to Criterion 5.6.
	1.2.5	Details of complaints and grievances (C 6.3)	Yes	The details of complaint and grievances can be access freely by the stakeholders. However the review of the records has to be with permission of Mill Manager and Social Liaison Officer.
	1.2.6	Negotiation procedures (C 6.4)	Yes	Negotiation procedure "11.0 Grievance Procedure for land Owner Issues" were available and verified during the audit.
	1.2.7	Continuous improvement plan (C 8.1)	Yes	The main SIA carried out in 2009 and improved on by a supplementary SIA carried out in August 2013 and the annually updated time bound action plan were available to the public.

Principle 2: Compliance with Applicable Laws and Regulations

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws	2.1.1	Evidence of compliance with legal requirements. <i>Major</i>	No	<u>Detas and Merchong Estate</u> Among the evidence of compliance observed were adequate housing, water supplies, medical, educational and welfare amenities in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) had been provided by the estates for all workers (local and foreign). This was confirmed by the workers and staff interviewed and by a perusal of the reports

and regulations				<p>made by the Visiting Medical Officer (VMO) and the estate Hospital Assistant (HA) who made monthly and weekly inspections (respectively) of the estate line sites. Observations made by the auditors during visits to the estate line sites and staff quarters had confirmed that the housing specifications were in accordance with the Minimum Standards of Housing and Amenities Act 1990. The number of houses was found to be sufficient to accommodate all the workers and staff.</p> <p>Every house was supplied with electricity and free, safe potable water. The water analysed by a certified laboratory and by the Health Department was found to be safe. House repairs were carried out when requested and the surrounding area maintained. Dispensaries (headed by a Hospital Assistant) were found in every estate for use by all sick employees and their dependents. Serious cases were sent to the nearby government hospitals by company vehicle with all medical expenses paid by the company. The workers were also covered by workman's compensation.</p> <p>IOI was not a member of MAPA and so was not bound by the MAPA-NUPW and MAPA-AMESU CA. However there was a direct contract of employment detailing payments and conditions of employment documented in the Offer of Employment which the workers and staff had to read and sign, a copy of which was given to the employee. This showed compliance with the the Malaysian Labor Laws (Am. Act A1238).</p> <p>The management of Bukit Leelau CU did not hire underage persons to work on the estate, the CU thus did not contravene the Children and Young Persons (Employment) Act 1966 (Act 350) and the Malaysian Labour Laws (Am. Act A1238).</p> <p>A person's socio-cultural, political or gender background was not taken into account when hiring a new employee. Only the person's qualification was considered. All workers (local or migrant, male or female) were covered by the same pay and conditions of employment associated with the jobs they were hired for. This was confirmed by an examination of the Offer of Employment and through consultations with workers. As such Bukit Leelau CU did not contravene the Human Rights Commission of Malaysia Act 1999 (Act 597).</p> <p><u>Bukit Leelau POM</u></p>
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			<p>Among the evidence of compliance observed were:</p> <p>Factory and Machinery Act 1967</p> <p>i) <i>Person In Charge Regulation 1970</i></p> <table><tr><td>Competent person</td><td>Bukit Leelau POM</td><td></td></tr><tr><td>Steam engineer</td><td>Available (2nd Grade Steam Engineer, Mill Manager)</td><td></td></tr><tr><td>ICE Visiting Engineer</td><td>Available, Maganza Solution (1st grade ICE Engineer)</td><td></td></tr><tr><td>Engine Driver (BHC)</td><td>Available (1st and 2nd grade engine driver)</td><td></td></tr><tr><td>ICE driver</td><td>Available (1st grade ICE driver, newly transferred from Pamol POM)</td><td></td></tr></table> <p>As per last year's NCR on the competent person issue, Bukit Leelau POM has appointed competent person for ICE visiting engineer. Frequent visit (monthly) has been carried out for 2014.</p> <p>ii) <i>Steam Boiler and Unfired Pressure Vessel 1970</i> Essential fittings – all 13 essential fittings was found in good condition and operational. Boiler gauge glass can be clearly seen from flaring position.</p> <p>Name plate affixed at tank – Boiler name plate and manufacture name plate was found affixed to the boiler.</p> <p>iii) <i>Notification, Certificate of Fitness and Inspection, Regulations 1970</i> Machine requiring CF – Steam boiler and unfired pressure vessel are scheduled for inspection on annual basis. Annual mill inspection was carried out on 18th April 2014. Period of validity (max 15 mth) – New CF was found valid until July 2015.</p> <p>iv) <i>Noise Exposure Regulations 1989</i> Last audiometric testing was carried out on May 2013 which involved 104 workers. 7 workers were identified with Standard Threshold Shift (STS) and have been retested. 5 out of 7 workers were hearing impaired and will undergo for annual audiometric. ENT doctor has also recommended for those infected workers eligible for SOCSO compensation and to be reported to DOSH (JKKP 7) under occupational disease. Compensation status will be verified in the next assessment. Furthermore, the 2014 audiometric has yet to be carried out and need to be expedited.</p>	Competent person	Bukit Leelau POM		Steam engineer	Available (2nd Grade Steam Engineer, Mill Manager)		ICE Visiting Engineer	Available, Maganza Solution (1st grade ICE Engineer)		Engine Driver (BHC)	Available (1st and 2nd grade engine driver)		ICE driver	Available (1st grade ICE driver, newly transferred from Pamol POM)	
Competent person	Bukit Leelau POM																	
Steam engineer	Available (2nd Grade Steam Engineer, Mill Manager)																	
ICE Visiting Engineer	Available, Maganza Solution (1st grade ICE Engineer)																	
Engine Driver (BHC)	Available (1st and 2nd grade engine driver)																	
ICE driver	Available (1st grade ICE driver, newly transferred from Pamol POM)																	

				<p><u>Electric Supply Act 1990</u> i) <i>Electrical Regulations 1994</i> Requirement of competent person (A4) – Competent A4 charginan was available.</p> <p><u>Environment Quality Act 1974</u> Section 49A – competent person for ETP, air pollution control and schedule waste</p> <p>As to date, there was no nomination and appointment of competent person for Bukit Leelau CU for air pollution control and ETP. Therefore, Major NCR (#MH1) was issued.</p> <p>Management has nominated Mr Ravi Tony from OSH Department to attend the Scheduled Waste Manager (CePSWAM) training in 2014. He will be in-charge on the scheduled waste management at for the CU.</p> <p><u>Scheduled Waste Regulations 2005</u> Scheduled waste generated and managed by own individual unit at Bukit Leelau CU. Type of wastes generated were found in 2nd Schedule. (Notification form to DOE). Inventory of waste were properly recorded and maintained and verified through 5th Schedule in the E-CN system. Latest disposal was made on 12/2/14.</p> <p>Some issues were sighted and still needs much improvements with regards to : i) <i>Regulation 7 (Application of special management of scheduled waste)</i> SW404 (clinical waste) generated and temporary stored at own estate before disposal. Bukit Leelau and Detas Estate moved their scheduled waste to the centralized clinic without approval from DOE. Special management of scheduled waste is required from DOE for such activities. Therefore, Major NCR (#MH1) was raised.</p> <p>ii) <i>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</i> Requirement in “<i>Jadual Pematuhan</i>” License number and validity period – 004118, (1/7/14 – 30/6/15) Discharge method – Water ways</p> <p>Air monitoring</p>
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				<p>a) Black smoke – Permissible emission limit is Ringleman 2 @ 40% opacity for 15 minutes in 1 hour and 15 minute (aggregation) in 24 hours. Occasional of black smoke emission was recorded with some justifiable conditions during start-up, uncontrolled burning and loading). Smoke density recorder was found operational and alarm is laudable enough to alert the operators. The equipment was last calibrated on 31/3/14 and due for next calibration on 30/9/14. Report to DOE is via CEMS-DIS and was found online during assessment.</p> <p>b) Particulate – < 0.4 g/Nm³ (Std C), stack sampling (biennially) Stack sampling has been consistently carried out as per required frequency.</p>
	2.1.2	A documented system, which includes written information on legal requirements. <i>Minor</i>	No	As per last year NCR on documented legal register, the corrective action evidence legal requirement register (Appendix 1, revision 1) dated 23rd September 2013 was not made available during the assessment at all the visited operating units. Therefore, the NCR has been upgraded to Major (# MH2).
	2.1.3	A mechanism for ensuring that they are implemented. <i>Minor</i>	Yes	Generally, Bukit Leelau CU has the mechanism for ensuring all the applicable legal requirements are implemented. The mechanism is by the implementation of internal audit by its Sustainability Team through evaluation of compliance exercise against the legal register.
	2.1.4	A system for tracking any changes in the law. <i>Minor</i>	Yes	Sustainability and OSH department are responsible for tracking of any changes in the law.
C 2.2 The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights.	2.2.1	Evidence of legal ownership of the land including history of land tenure. <i>Major</i>	Yes	<u>Bukit Leelau an Mekassar Estate</u> The operating units had a lease on the land granted by the Pahang State government as a legal ownership. The title numbers and lease periods was verified
	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	<u>Bukit Leelau and Detas Estate</u> All the estates were in compliance with the condition as stated in the terms and conditions of the lease agreements i.e. for Oil Palm cultivation.
	2.2.3.1	Evidence that boundary stones along the perimeter adjacent to state land and other reserves are being located and visibly	No	<u>Bukit Leelau and Detas Estate</u> It was observed that there were distinct red coloured wooden boundary markers. The boundary stones, its positions of these markers were labelled and marked on the Boundary Stone maps and the position of each marker recorded. However during site visit to Bukit Leelau it was found the boundary

		maintained. <i>Minor</i>		stones along the perimeter adjacent to Pekan Forest Reserve and Kampung Tanjung at Detas Estate was not evident. Therefore Minor NCR #KN-2 was raised.
	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	Not applicable as there is no land dispute at this 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	Not applicable as there is no estate land encumbered by customary rights.
	2.3.2	Map of appropriate scale showing extent of claims under dispute. <i>Major</i>	Yes	NA
	2.3.3	Copies of negotiated agreements detailing process of consent (C2.2, 7.5 and 7.6). <i>Minor</i>	Yes	NA

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	3.1.1	Annual budget with a minimum 2 years of projection <i>Major</i>	Yes	Bukit Leelau CU continued to persevere to make commitment to long-term economic and financial viability. The annual budgets for 2014/15 to 2016/2017 were sighted. The budget provisions cover activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget included projections on yield/ha, oil/ha, kernel/ha and total cost of

achieve long-term economic and financial viability.			production per m ton & per ha. Monitoring mechanism to ensure budget is not overrun is through communication between the estate and regional General Manager by using <i>Additional Votes for Revenue Expenditure</i> format. <u>Bukit Leelau POM</u> The yearly budget and projections where the cost of production was reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating (OPEX) cost. The operating expenditure included expenditure for mill and mainly on routine maintenance(parts and workmanship), administration cost, line-site and house repair, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training, etc.																				
	3.1.2	Annual replanting programme projected for a minimum of 5 years with yearly review. <i>Minor</i>	Yes <u>Detas Estate</u> <table><tr><th>Year</th><th>Ha</th><th>Progress</th></tr><tr><td>2014/15</td><td>332</td><td>Just started felling in Sep 2014</td></tr><tr><td>2015/16</td><td>357</td><td>NA</td></tr><tr><td>2016/17</td><td>295</td><td>NA</td></tr><tr><td>2017/18</td><td>0</td><td>NA</td></tr><tr><td>2018/19</td><td>0</td><td>NA</td></tr><tr><td>2019/20</td><td>0</td><td>NA</td></tr></table> Replanting programme was first established on 21/12/2013 and last revised in 4/9/2014.	Year	Ha	Progress	2014/15	332	Just started felling in Sep 2014	2015/16	357	NA	2016/17	295	NA	2017/18	0	NA	2018/19	0	NA	2019/20	0
Year	Ha	Progress																					
2014/15	332	Just started felling in Sep 2014																					
2015/16	357	NA																					
2016/17	295	NA																					
2017/18	0	NA																					
2018/19	0	NA																					
2019/20	0	NA																					

Principle 4: Use of Appropriate Best Practices by Growers and Millers

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are	4.1.1	Documented Standard Operating Procedures (SOP) for estates and mills. <i>Major</i>	Yes	Bukit Leelau CU continued to use all the established Standard Operating Procedures (referred to in the company as StOP) for both its estates and mill. The StOP for the mill was established in April 2008 whilst that for the estate had

appropriately documented and consistently implemented and monitored.				<p>its StOP documented in December 2007. The estate has established new StOP for Buffalo Assisted Harvesting System (BAHS) and Buffalo Healthcare which were revised January 2012 and distributed to all estates on 20th January 2012. The StOP was approved by Group Plantation Director, Dato' Fong Lai Choong. The assessment team has verified that, the established StOP still found relevant for estate and mill operations activities. Among the Estate operations covered by the procedures are Buffalo Healthcare, nursery, land clearing and preparation, planting technique, cover crop, fertilizer application, weeding, pest and disease, harvesting & evacuation, road maintenance, workshop, foliar sampling.</p> <p>The simplified versions of the StOP were also made available at the muster ground, office and chemical store notice boards. The smallholders were also given a copy of all producers which are relevant to their farming operation such as harvesting, fertilizer application, spraying, etc. Interview with the smallholders has shown that they understand the requirements of the procedures.</p>
	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><u>Detas Estate</u> Among the records of monitoring observed were:</p> <ul style="list-style-type: none"> • Harvesting interval monitored through "Harvesting Interval" chart. • FFB quality recorded in "FFB Quality: summary which data obtain from field and mill checking. In July 2014, the quality is within the limit. <p><u>Bukit Leelau POM</u> Among the records of monitoring observed were:</p> <ul style="list-style-type: none"> • Monthly Production, Monthly Costing and Annual Reports on monitoring of all activities were made available during the audit as well as environmental and safety related records. • The submission of MPOB (EL) MF4 and MPOB PX4-MF on monthly basis to MPOB as part of the formal performance reports. Latest reports were available or viewing. These monitoring reports were kept and maintained in the offices for at least a year.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal	4.2.1	Monitoring of fertilizer inputs through annual fertilizer recommendations. <i>Minor</i>	Yes	<p><u>Detas Estate</u> Fertilizer recommended by IOI Research Centre located in Batang Melaka, Gemenchah. Latest recommendation was documented on 19/2/2014 for 2014 manuring programme. Fertiliser application rate per palm (dosage) varies from field to field.</p> <p>As at August 2014, Detas Estate has completed 90% and the progress was on</p>

and sustained yield.				schedule. The remaining program is the application of RP. The actual progress of fertilizer application is recorded in the estate's costing book.
	4.2.2	Evidence of periodic tissue and soil sampling to monitor changes in nutrient status. <i>Minor</i>	Yes	<u>Detas Estate</u> Annual fertiliser recommendation was done by the Agronomist with reference to soil and foliar sampling. The sampling is done annually for all fields. The latest sampling report by IOI Research Centre was produced on and available at the estate office.
	4.2.3	Monitor the area on which EFB, POME and zero-burn replanting is applied. <i>Minor</i>	Yes	<u>Detas Estate</u> Programme for EFB application has been established for 2014/15 – programmed for 621 Ha (mature and immature area). Monitoring the correct rate being applied can be improved. Currently no clear record to indicate the total mt of FFB being sent to a field (observation). As at August 2014, has just applied 8 Ha. Actual progress of EFB application is recorded in the costing book. POME is not applied due to limited supply from 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	<u>Detas Estate</u> It was observed that practices to minimise and control erosion and degradation of soils were advocated through proper stacking of fronds, EFB application, construction of terraces in hilly terrains, avoidance of blanket spraying and maintenance of soft vegetation in interlines.
	4.3.2	Avoid or minimize bare or exposed soil within estates. <i>Minor</i>	Yes	<u>Detas Estate</u> No exposed or bare soil observed.
	4.3.3	Presence of road maintenance programme. <i>Minor</i>	Yes	<u>Detas Estate</u> Road maintenance programs and road side drains were observed in Detas Estate, Road cambering was geared towards in-flow of surface water into the fields.
	4.3.4	Subsidence of peat soils should be minimised through an effective and documented water management programme. <i>Minor</i>	Yes	<u>Detas Estate</u> Based on soil map provided, no peat soil at Detas 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	Yes	<u>Detas Estate</u> No fragile soil at Detas Estate.

		soils). <i>Minor</i>		
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	Bukit Leelau CU had continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estate. During the site review at Detas Estate, it was seen buffer zone boundary with natural waterways were identified and demarcated with signage being erected along the river. The oil palm trees in the buffer zone were painted red at the trunk to differentiate them with the other non-riparian zone oil palm trees. The width of the buffer zone varies depending on the width of the river in accordance to the DID requirements. The boundary marker for buffer was sufficient and maintained. It was clear that IOI has the policy to maintain the buffer by restricting agrochemicals application and will be left undeveloped during replanting.
	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 observation of bunds, weirs or dams across any water ways and rivers in any of the visited areas of Bukit Leelau CU.
	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	Two natural streams identified crossing Detas Estate which name given Natural Stream A and Natural Stream B. Last tested for water quality was done on 13/11/2013. There is a slight increase on SS at outgoing point compare to incoming point of the estate about 10 mg/l.
	4.4.4	Monitoring rainfall data for proper water management. <i>Minor</i>	Yes	Rainfall records are available on site. Average rainfall per year 3,000 mm over 150 rain-days for Detas Estate. Driest month is February and March, and highest is in December.
	4.4.5	Monitoring of water usage in mills (tonnage water use/tonne FFB processed). <i>Minor</i>	Yes	Bukit Leelau POM continued to monitor its water consumption for processing FFB and records were available for verification.
	4.4.6	Water drainage into protected areas is avoided	Yes	<u>Detas Estate</u> No water drainage going to protected areas at Detas Estate.

		wherever possible. Appropriate mitigating measures will be implemented following consultation with relevant stakeholders. <i>Minor</i>		
	4.4.7	Evidence of water management plans. <i>Minor</i>	Yes	<u>Detas Estate</u> Detas Estate initially has only tube well until a new one constructed in August 2014 to give sufficient water supply to its domestic use (housing and administration office). So far there is no experience that the water supply from tube-well was short. Nevertheless, awareness is created among the workers to save water through verbal reminder.
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	<u>Detas Estate</u> There was a documented integrated pest management (IPM) system in place at Detas states. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and wild boar. The IPM technique for rats includes rearing barn owls (<i>tyto alba</i>), bagworm control includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublata</i> and for rhino beetles is by using pheromone trap.
	4.5.2	Monitoring extent of IPM implementation for major pests. <i>Minor</i>	Yes	<u>Detas Estate</u> Major pest is bagworms which mainly at the young palms field. Last treatment was in July 2014 at Block 11F, 11E, 11D, 11C and 11A. Treatment was triggered based on field census done 2 weeks before. However, some the field census has shown the population of bagworms below threshold level (observation). Rat attack was also detected at Detas Estate. Last rat baiting campaign was carried out in August 2014 at Block 10A, 10B, 10C 9A & 9B (total Ha 293) using <i>broadifacoum</i> . Application was triggered based on field census done 1 month before. Campaign is stopped if bait acceptance is below 20%.
	4.5.3	Recording areas where pesticides have been used. <i>Minor</i>	Yes	<u>Detas Estate</u> Areas applied with pesticides can be seen in the costing book.
	4.5.4	Monitoring of pesticide usage	Yes	<u>Detas Estate</u>

		units per hectare or per ton crop e.g. total quantity of active ingredient (a.i.) used/tonne of oil. <i>Minor</i>		Records are available on site.
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	Oil Palm Agrochemical Policies dated July 2005 is referred to on the justification for agrochemical used. Company maintains an up-to-date list of chemical used, chemical register in each estate and observation in the storage area and screening of the application record shows no evident of use of prohibited chemicals in operation. The estates maintain historical records of chemical used, amounts applied, dates, and areas of application.
	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	<u>Bukit Leelau Estate</u> Bukit Leelau estate had continued to use all agrochemicals those that have been registered under the Pesticides Act 1974 (Act 149) and Highly Toxic Pesticide Act 1996. This has also been cross checked at the chemical store during the site visit.
	4.6.3	Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. <i>Major</i>	Yes	<u>Bukit Leelau Estate</u> The chemical stores were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. All of the stores had been well ventilated and secured. Only authorized personnel were allowed to handle the chemicals. All the chemicals were stored and segregated according to its chemical class.
	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	<u>Bukit Leelau Estate</u> The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were being trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS/CSDS training. It was also noted that MSDS/CSDS are available at all sites during the audit.

	4.6.5	Annual medical surveillance as per CHRA for plantation pesticide operators. <i>Major</i>	Yes	<u>Bukit Leelau Estate</u> Annual medical surveillance was carried out for the pesticides operator as per CHRA recommendation. The latest medical surveillance was done on 27/3/14. Refer to medical surveillance, DOSH registration number JKKP HQ/12/DOC/00/258. All workers who handled pesticides and manure including 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 their job.
	4.6.6	No work with pesticides for confirmed pregnant and breast-feeding women. <i>Major</i>	Yes	<u>Bukit Leelau Estate</u> There was no pregnant and breast feed women working as pesticides operator based on the workers master list and monthly health surveillance report from the estate hospital assistant. Latest report dated 2/8/14 was sighted. It was also verified during site review that no female workers involved in handling the pesticides.
	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	<u>Bukit Leelau Estate</u> It was noted that Bukit Leelau Estate had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Paraquat had not been used and been replaced by other systemic herbicide chemical under classification of class III and IV.
	4.6.8	Documented justification of any aerial application of agrochemicals. No aerial spraying unless approved by relevant authorities. <i>Major</i>	Yes	Aerial spraying is not practiced at Bukit Leelau CU.
	4.6.9	Evidence of chemical residues in CPO testing, as	Yes	No request from buyer for chemical residue testing in CPO.

		requested and conducted by the buyers. <i>Minor</i>		
	4.6.10	Records of pesticide use (including active ingredients 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>	Yes	<u>Bukit Leelau Estate</u> Pesticides usage from 2009 had been monitored in the chemical register. It recorded all chemicals used as herbicides & insecticides. Record sheets documenting the amount and types of chemicals used for 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> <u>The safety and health (OSH) plan shall cover the following</u>		
	a)	A safety and health policy, which is communicated and implemented	Yes	Bukit Leelau CU still continued adopting the IOI Group's Occupational Safety and Health Policy. The policy had been communicated to all employees through briefings and being displayed on the estates notice boards. A safety management plan (July 2010- June 2015) for each operating unit had been established. The management plan has addressed issues related to emergency, treatment of illness/injury during the job, compliance with regulations such as Occupational Safety and Health (Safety Committee) Regulations, Occupational Safety and Health (notification of accident, dangerous occurrence, occupational poisoning and occupational disease).
	b)	All operations have been risk assessed and documented.	Yes	<u>Bukit Leelau Estate</u> The hazard identification, risk assessment and risk control had been carried out covering on the activities both in the estates and mill. Updated HIRARC register dated was presented during the assessment. Latest review was noted after one case of fatal accident involving harvesting worker on 17/4/14 and also on the Buffalo Assisted Harvesting System (BAHS) was also incorporated. For the mill,

				not much change noted for identified activities. Appropriate risk control measures had been identified and a person had been assigned to monitor the implementation of the control measures during field and site assessment.
	c)	<p>An awareness and training programme which includes the following specifics for pesticides:</p> <ul style="list-style-type: none"> 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	<p>Chemical hazards communication had been given through awareness and training programme to all workers involved in handling chemicals. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Those trained included sprayers, manure spreaders, laboratory personnel, boilerman and store clerk. Field inspection and observation of spraying tasks confirmed chemicals being applied were in accordance with the product safety precautions. MSDS were made available at point of use – for example, at mill's water each estate treatment plant, boiler chemical dosing area and chemical mixing area and at the chemical store.</p> <p>Training and awareness programme has been established for 2014 were OSHA 1994 Emergency Response Plan, SHE responsibility, Vehicle maintenance, Estate training programme and lastly on the Sustainability training.</p>
	d)	<p>The appropriate personal protective equipment (PPE) are used for each risk assessed operation.</p> <ul style="list-style-type: none"> 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	<p><u>Bukit Leelau Estate</u> Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation. During the site tour, it was observed that signage (to remind workers to wear appropriate PPE) was posted at the appropriate places. Workers interviewed understood the reasons and importance why they were required to wear the PPE.</p> <p>Example of PPE used for the specific field task i) Spraying – 3M 3026 ii) Manuring – 3M N95 iii) Harvester – sickle cover, hard hat etc.</p>
	e)	The responsible person (s) should be identified.	Yes	<p><u>Bukit Leelau Estate</u> Person in charge as a safety coordinator/safety and health secretary was identified</p>

				<u>Bukit Leelau POM</u> Mill engineer, was appointed as SHC secretary.
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	Quarterly Safety & Health Committee meeting held at the respective unit in the CU chaired by manager (mill or estate). Agenda of meeting were: i) Medical Assistant Report (Monthly Accident statistics) ii) Workplace inspection report iii) Follow-up on previous issues and arising matters Ad hoc emergency SHC meeting pertaining to fatal accident case was done on 17/4/14. Chronology on accident and investigation was carried out by committee members with the assistance of IOI Safety Officer.	
g)	Accident and emergency procedures should exist and instructions should be clearly understood by all workers.	Yes	Information to response potential emergencies had been disseminated. This included emergency contact number, site plan showing evacuation route to assembly point and location of firefighting equipment and action to be taken during emergency by staff and contractors. Instructions to respond to accident and emergency situation were tested and it was found to be clearly understood by all workers interviewed both at the mill and field. The latest fire drill was carried out on 7 February 2014 for Bukit Leelau POM.	
h)	Workers trained in First Aid should be present in both field and mill operations.	Yes	Trained first aider was available at all work area both in the estate and mill. Cross checked with training records found that most of the estate mandore and department head has been trained on first aid.	
i)	First Aid equipment should be available at worksites	Yes	First Aid Kit was made available and maintained based on site review in the estate and mill. Each work area for example spraying, manuring and harvesting has been supplied with the first aid kit. Trained first aider will take charge on monitoring of the usage and will be replenished on monthly basis by MA.	
4.7.2	Records should be kept of all accidents and periodically reviewed at quarterly intervals. <i>Major</i>	Yes	Accident statistics are being maintained and periodically reviewed during safety and health committee meeting. DOSH will be notified if there is an accident with more than 4 days of MC using JKPP 6 form and annual accident statistic using JKPP 8 form. Accident investigation has been carried out to all accident cases for internal reporting as well as 3 rd party reporting to DOSH. Records of accident investigation including meeting minute, accident chronology, sketch of accident	

				area, personal information including training records, corrective action were properly kept for future reference.																				
	4.7.3	Workers should be covered by accident insurance. <i>Major</i>	Yes	<p>Bukit Leelau CU continued to ensure all workers working in the premise (both mill and estate) covered by insurance. All local workers were covered by SOCSO as required under Employee's Social Security Act 1969. Foreign workers for instance, were covered by insurance as per Workmen Compensation Act 1952. Sample of foreign workers under Perusahaan Mekassar (M) - Bukit Leelau Mill found that all had been covered by insurance and found valid. Validity period 1/10/13 to 30/9/14 and yet to be renewed for 2015.</p> <p>It was verified that the deceased worker was covered by insurance and the compensation will be paid to his dependant. At the point of audit, compensation process is still in progress and waiting for the official post mortem report for the hospital. Status will be verified in the next audit.</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><u>Detas Estate</u> Training plan and records for 2014 available for verification. Records of training conducted are available. Samples of training records that have been sighted were:</p> <table><tr><th>Date of Training</th><th>Title</th><th>Trainer(s)</th><th>Participants</th></tr><tr><td>12/4/2014</td><td>OHS on Harvesting</td><td>Management</td><td>all harvesters</td></tr><tr><td>10/5/2014</td><td>Scheduled Wastes</td><td>Management</td><td>workshop foreman and HA</td></tr><tr><td>21/5/2014</td><td>Chemical sprayer</td><td>Management</td><td>all sprayers</td></tr><tr><td>17/3/2014</td><td>Replanting</td><td>Management</td><td>Contractor's workers</td></tr></table> <p><u>Bukit Leelau Estate and POM</u> Training and awareness programme has been established for 2014. Among the training programme were :</p> <ul style="list-style-type: none">i) OSHA 1994ii) Emergency Response Planiii) SHE responsibilityiv) Vehicle maintenance	Date of Training	Title	Trainer(s)	Participants	12/4/2014	OHS on Harvesting	Management	all harvesters	10/5/2014	Scheduled Wastes	Management	workshop foreman and HA	21/5/2014	Chemical sprayer	Management	all sprayers	17/3/2014	Replanting	Management	Contractor's workers
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				<div>v) Estate training programme vi) Sustainability training</div> <div>Records of training conducted are available. Samples of training records that have been sighted were:</div> <table><tr><th>Date of Training</th><th>Title</th><th>Trainer(s)</th><th>Participants</th></tr><tr><td>30/4/14</td><td>PPE Training</td><td>Management</td><td>Workers</td></tr><tr><td>2/5/14</td><td>Spraying Training</td><td>Management</td><td>Spraying workers</td></tr><tr><td>6/6/14</td><td>Domestic Waste Management</td><td>Management</td><td>Workers</td></tr><tr><td>9/6/14</td><td>Scheduled Waste training</td><td>Management</td><td>Workers and staff</td></tr><tr><td>7/2/14</td><td>Mock Evaluation and Fire Fighting Drill</td><td>Management & ESH coordinator</td><td>Mill Workers</td></tr></table>	Date of Training	Title	Trainer(s)	Participants	30/4/14	PPE Training	Management	Workers	2/5/14	Spraying Training	Management	Spraying workers	6/6/14	Domestic Waste Management	Management	Workers	9/6/14	Scheduled Waste training	Management	Workers and staff	7/2/14	Mock Evaluation and Fire Fighting Drill	Management & ESH coordinator	Mill Workers
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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

Clause	Indicators		Comply Yes/No	Findings						
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative	5.1.1	Documented aspects and impacts risk assessment that is periodically reviewed and updated. <i>Major</i>	Yes	<p>Environmental aspect and impact evaluation was available. The methods of identification were generally through site inspection by the estate or mill management & sustainability team and stakeholders consultation such as input from the DOE, surrounding communities.</p> <p>At Detas Estate, among the environmental aspects & impacts identified by the management and their plan to mitigate are described in the table below:</p> <table><tr><th>Environmental aspects</th><th>Environmental Impact</th><th>Mitigation measure/Management plan</th></tr><tr><td>Lechate from</td><td>water pollution</td><td>application must be far from</td></tr></table>	Environmental aspects	Environmental Impact	Mitigation measure/Management plan	Lechate from	water pollution	application must be far from
Environmental aspects	Environmental Impact	Mitigation measure/Management plan								
Lechate from	water pollution	application must be far from								

impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.				application of EFB	and GHG emission	natural stream/buffer zone and thin layer	
				Replanting activity	soil erosion and air pollution through emission of GHG from machinery	<ul style="list-style-type: none"> stacking of fell palm along the contour, terracing, planting platform, establishment of cover crop immediately after felling, avoid planting in buffer zone Water monitoring once in every six months includes parameter such as turbidity, SS, TS, DO, BOD, COD, AN, pH, N, OG, heavy metals, Coliform, E. Coli. Six sampling points were identified and trends were analysed and if any abnormal result detected, investigation shall be made For contractors doing replanting, training will be given on replanting procedure and will be required to provide secondary containment during machinery servicing to contain oil spillage 	
				Generation of schedule waste from agrochemical, workshop and clinic	soil contamination and water pollution	keep safely in enclosed store, use of secondary containment during servicing, oil trap, spill kit	

				Generation of domestic waste from housing and estate	water pollution, soil contamination and air pollution (from opened burning under abnormal condition)	rubbish bins are provided and will be collected by line sweeper, segregated from recyclable, non-recycled waste sent to landfill, 'no burning' signage at line-sites				
				Potential spillage from pre-mixing activity	soil and water pollution	special area for pre-mixing activity which can prevent spillage from going to environment i.e. concrete bund and spill kit				
				Potential spillage of chemical from field maintenance activities	water & soil contamination	no agrochemical activities in the buffer zone, information given through training				
				Spraying, harvesting	soil erosion	maintaining the soft grasses at the slope area, stacking fronds in a way to block surface runoff, instruction through training				
				<p>The environmental aspects would be reviewed once a year depending on change of activities and input from stakeholders. Last review was done on 27/8/2014. There was no change between the two last reviews. There was only progress report of the implementation of the management plan.</p> <p>At Bukit Leelau POM on the other hand, among the environmental aspects & impacts identified by the management and their plan to mitigate are described in the table below:</p>						
				<table><tr><th>Environmental aspects</th><th>Environmental Impact</th><th>Mitigation measure/Management plan</th></tr><tr><td>Effluent discharge.</td><td>water pollution, global warming</td><td>Appropriate maintenance of ETP system e.g. desludging</td></tr></table>	Environmental aspects	Environmental Impact	Mitigation measure/Management plan	Effluent discharge.	water pollution, global warming	Appropriate maintenance of ETP system e.g. desludging
Environmental aspects	Environmental Impact	Mitigation measure/Management plan								
Effluent discharge.	water pollution, global warming	Appropriate maintenance of ETP system e.g. desludging								

				methane gas from effluent		to be carried out based on programme and using green tubes (geo-tube) to contain sludge	
				Smoke emission from boiler's chimney	Air pollution	To carry out best practice on biomass fuel burning method and close monitoring of smoke quality	
				Generation of schedule waste from maintenance activities	Soil contamination and water pollution	keep safely in enclosed store, use of secondary containment during servicing, oil trap, spill kit	
	5.1.2	Environmental improvement plan to mitigate the negative impacts and promote the positive ones, is developed, implemented and monitored. <i>Minor</i>	Yes	Bukit Leelau CU has developed a management plan which is included in the environmental aspect impact assessment and being reviewed once a year. Latest review was for Aug 2014. Not much change noted in the document and mostly on the management plan updates.			
C 5.2 The status of rare, threatened or endangered species (ERTs) and high conservation value habitats, if any, that exists in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.	5.2.1	Identification and assessment of HCV habitats and protected areas within landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings. <i>Major</i>	Yes	<p>As observed in the previous surveillance, a report on HCV sites within the CU had been prepared. The High Conservation Value Assessment Report, which was completed in 20th September 2009, had identified HCV sites for each of the estates. The report was reviewed in August 2014 and action plan was prepared.</p> <p>Specific sites had been identified in each of the estate for protection of their high conservation values. Sites with HCV1, HCV 4, HCV 5, and HCV 6 had been identified. Maps demarcating these HCV sites had also been prepared. The audit team had inspected the sites protected in the Bukit Leelau Estate, Bukit Leelau POM and Detas Estate. It was observed that signage had been erected in all these HCV sites indicating the classes and that no activity was permitted in these areas</p> <p>For HCV 1, the various ecosystems had been protected in the estates. The Bukit Leelau Estate HCV site was located next to the Pekan Forest Reserve. The boundary was inspected and found to be marked on maps and demarcated on ground.</p> <p>The most common were sites classified under HCV 4 and 5 for soil erosion</p>			

				<p>control and water protection of stream from Bukit Leelau Estate flowing through the Kampongs and then into Sg Serai. The peat area at block 98A(Y) (86ha) had also been inspected and found to be marked on maps and demarcated on ground. Proper demarcation of the buffer zone done using PVC pegs or marking of circle painting at the last palm adjacent to buffer zone.</p> <p>For HCV 6, areas with religious sites and rituals as well as cultural events were identified as in the Detas Estate and Bukit Leelau POM where a site was believed to be a sacred had been marked as HCV 6.</p> <p>A summary of management actions had been proposed in the HCV Assessment Report. In addition, a HCV Management Action Plan had been written for each estate. Both documents were examined during the assessment.</p> <p>It was observed that signage had been erected at each estate to ban hunting. The entrances to each estate had gates and manned by guards. Regular patrols had been conducted and reported on the protection of these HCV sites. Patrolling records was verified.</p>
	5.2.2	Management plan for HCV habitats (including ERTs) and their conservation. <i>Major</i>	Yes	<p>The HCV Management Plans for Bukit Leelau POM and Bukit Leelau Estates 2014 were presented to the assessment team. There is no HCV habitats identified in the either POM or Estates.</p> <p>Currently, the management plan was reviewed on August 2014. Since the monitoring has not found any ERTs, there are no any changes, except for awareness training and continuous monitoring.</p>
	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>Poaching was not allowed within the plantation with warning signage being placed at the entrances of each estate. Evidence of a commitment to discourage any illegal or inappropriate hunting had been instituted through control entrance gates and Auxiliary Police monitoring.</p>
C 5.3 Waste is reduced, recycled, re-used and disposed off in an environmentally	5.3.1	Documented identification of all waste products and sources of pollution. <i>Major</i>	Yes	<p><u>Detas Estate</u> The estate continued to practice the 3R policy (reduce, recycle, re-use) on waste management and to dispose them off in an environmentally and socially responsible manner. Among those identified were general/domestic waste, scheduled waste, scrap metal, crop residue/biomass from estate. Biomass from</p>

and socially responsible manner.

the estate was mainly from palm trunk of felled palms and pruned fronds.

The segregated domestic and office waste such as paper, plastic and glass collected are sold to recycling vendors. Scrap metal is also accumulated and metal from old agricultural equipment like trailers, etc. are stored in designated areas and sold to recycling vendors.

Other waste generated from the maintenance activities of equipment and machinery in the estates were scheduled wastes such as spent lubricant oil, spent oil filter, clinical waste and empty chemical containers.

Bukit Leelau POM
For mill operation, source of pollution and waste generated from mill processes and related activities in the premise were described as follows:

Mill Processes/Activity	Waste source and of pollution	Operational plan
Pressing/Depericarping	Shell & Fibre	Used as boiler fuel Sell as by product
Threshing	EFB	Mulching and composting
Oil recovery	Decanter cake /Slurry/ sludge discharge	Mulching and composting Treated in the ETP
Hycrocyclone/Claybath	Wet shell and calybath discharge water	Sell as by product Treated in the ETP
Cleaning	Cleaning water	Treated in the ETP
Maintenance	Used oil & hydraulics, oil filters and other type of scheduled waste	Managed as per Scheduled Waste Regulation 2005
Boiler and genset operation	Clinkers, smoke and particulate emission	For road maintenance Operation to be in

					POME (palm oil mill effluent)	POME liquor and solid	accordance with EQA 1974 Operation to be in accordance with EQA 1974	
	5.3.2	Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution. <i>Minor</i>	Yes	Bukit Leelau CU continued to implement the established operational plan to avoid and reduce pollution based on the significant impact to the environment. It was further defined in the Environmental Impact Assessment, Management Action Plan and Continuous Improvement Plan.				
	5.3.3	Evidence that crop residues / biomass are recycled (Cross ref. C 4.2). <i>Minor</i>	Yes	Cross refer to C4.2.				
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	<u>Detas Estate</u> No renewable energy used at Detas Estate. <u>Bukit Leelau POM</u> Bukit Leelau POM has recorded its renewable energy used i.e. fibre and shell used for boiler.				
	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	<u>Detas Estate</u> The diesel consumption at Detas Estate is as follow: 2013/14 = 1.59 lt/mt CPO 2012/13 = 1.37 lt/mt CPO 10% increase in diesel consumption was due to more utilization of tractors on maintenance work at replanting areas. <u>Bukit Leelau POM</u> Bukit Leelau POM recorded the total diesel consumed was 400,569 It over 23,044 mt CPO produced, i.e. 17.38 lt/mt CPO, for the duration from July 2013 to June 2014. This was mainly from generator sets and prime movers. Current fibre/shell used is not dependable with the diesel used in generator set.				
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 the Environmental Quality (Declared Activities) (Open	Yes	From site inspections, it was confirmed that the Bukit Leelau CU had not been practicing open burning in line with its policy on zero burning.				

avoided except in specific situations, as identified in the ASEAN Guidance or other regional best practice.		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	<u>Detas Estate</u> It was observed that previous palms were felled, chipped and windrowed during the site visit at Block 86B of Detas Estate. This was done by a contractor using a few units of excavator.
	5.5.3	No evidence of burning waste (including domestic waste). <i>Minor</i>	Yes	<u>Detas Estate</u> The domestic waste is tied in empty fertilizer bags and disposed (P5) – this is to prevent scavenging by monkeys and other animals. The pits are then filled with soil when full with waste. This method of filling discourages scavenging both by humans and animals and eliminates or less reduces odours. Notice boards of the date of opening and closing of the pits were sighted at the pits.
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	Documented plans were available in Environmental Impact Assessment, Management Action Plan and Continuous Improvement. Cross refer to C 5.1
	5.6.2	Plans are reviewed annually. <i>Minor</i>	No	Environmental Impact Assessment, Management Action Plan and Continuous Improvement Plan are annually reviewed. However, it was noted that the action plan for the mill dated 21/8/14, has not included boiler operating condition (normal/uncontrolled burning/start-up & loading), thus a Minor NCR # MH4 was issued.
	5.6.3	Monitor and reduce peat subsidence rate through water table management. (Within ranges specified in C 4.3). <i>Minor</i>	Yes	<u>Detas Estate</u> Based on the soil map, there is no peat soil at Detas Estate. The soils at this estate are mainly of Rasau, Bungor, Colluvium and Padang Besar series. No presence of peat soil.

Principle 6: Responsible Consideration of Employees and Of Individuals and Communities by Growers and Millers

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management, including	I 6.1.1	A documented social impact assessment including records of meetings. <i>Major</i>	Yes	<u>Detas and Merchong Estate</u> A documented social impact assessment (SIA) was prepared for December 2009 until November 2014. Records of meetings held were made available. <u>Bukit Leelau POM</u>

replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.				A documented social impact assessment (SIA) was prepared on 8th September 2009. The review was conducted on 20 August 2014. The records of meetings held were made available and a time bound action plan and activity for mitigating and monitoring the negative impacts were established, incorporating the issues identified by the main SIA from January 2014.
	I 6.1.2	Evidence that the assessment has been done with the participation of affected parties. <i>Major</i>	Yes	<u>Detas and Merchong Estate</u> Internal and external stakeholders were interviewed during the assessment to obtain their views on the impact of estate operations on their life. Records were kept and made available to the auditors. These consultations and the follow-up actions taken were confirmed by the stakeholders (estate workers and staff, local community leaders and suppliers and contractors) interviewed by the auditors during the audit. <u>Bukit Leelai POM</u> Evidence that the assessment has been done with the participation of affected parties has been verified. Government agencies, nearby estates, contractors, supplier and internal FFB supplier.
	I 6.1.3	A timetable with responsibilities for mitigation and monitoring is reviewed and updated as necessary. <i>Minor</i>	Yes	<u>Detas and Merchong Estate</u> An updated time bound action plan with responsibilities for mitigating and monitoring the impacts identified in the assessment was established. Records of actions taken to monitor and overcome the negative impacts were available. <u>Bukit Leelau POM</u> A timetable with responsibilities for mitigation and monitoring is reviewed and updated as necessary. The latest review was conducted immediately after stakeholder meeting on 27 August 2014 and 8 September 2014.
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.	I 6.2.1	Documented consultation and communication procedures. <i>Major</i>	Yes	<u>Detas and Merchong Estate</u> A file on internal and external communication and consultation was kept and made available to the auditors. In addition there was also a Grievance/Complaints Book for recording complaints from stakeholders and actions taken in response to the complaints. <u>Bukit Leelau POM</u> Consultations and communications with stakeholders including local communities (estate and neighbouring communities) were carried as part of the main SIA and its annual review. Stakeholder meetings attended by the CU's management and community leaders, workers' representatives, smallholders,

				<p>suppliers and related government agencies were annually held in conjunction with the SIA and its review.</p> <p>The minutes of the meeting were recorded, upon which the time bound action plan was developed to mitigate the negative impacts and enhance the positive ones. These meetings and the follow-up actions taken were confirmed by the stakeholders (estate workers and staff, <i>Orang Asli</i>, local community leaders and smallholders) consulted by the assessors.</p>
	I 6.2.2	<p>A nominated plantation management official at the operating unit responsible for these issues.</p> <p><i>Minor</i></p>	Yes	<p><u>Detas and Merchong Estate</u> A plantation management official at the operating unit level had been nominated by estates and mill to be responsible on issues related to consultations and communication between growers and/or millers with local communities and other affected or interested parties.</p> <p><u>Bukit Leelau POM</u> A Cadet Engineer #901230-08-6451 had been nominated to be responsible on issues related to consultations and communication between growers and/or millers with local communities and affected or interested parties. Appointment letter dated 1st August 2014 was verified.</p>
	I 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.</p> <p><i>Minor</i></p>	Yes	<p>An updated list of stakeholders consisting of contractors/suppliers, local government institutions and agencies, <i>Orang Asli</i> village heads and workers' representatives was kept and made available to auditors. Records of communication with stakeholders and actions taken in response to their input were also kept and made available to auditors.</p>
<p>C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.</p>	6.3.1	<p>Documentation of the process by which a dispute was resolved and the outcome.</p> <p><i>Major</i></p>	Yes	<p>As noted in previous assessments, there is documentation of the process by which a dispute is recorded as well as action/actions taken to overcome it. Bukit Leelau CU keeps a Grievance/Complaints Book (known as the Green Book by workers, staff and external stakeholders). The aggrieved parties could either fill in the complaint form in the Green Book or submit the complaint verbally to anyone in the main office or to the responsible official on social issues or to the workers' representatives or gender representatives who would then fill in the complaint form on their behalf.</p>
	6.3.2	<p>The system resolves disputes in an effective,</p>	No	<p><u>Detas and Merchong Estate</u> An examination of the entries in the Green Book showed that generally the</p>

		timely and appropriate manner. <i>Minor</i>		<p>system was able to resolve complaints and disputes in an effective, timely and appropriate manner.</p> <p><u>Bukit Leelau POM</u> A complaint on expensive goods and food at Bukit Leelau mill's canteen was recorded in the grievance book and also raised by sexual/gender secretariat in the Sexual/Gender Committee meeting dated 9 February 2013 and 14 May 2013. It was observed that price of goods and food was not displayed in the canteen. Although, complaint has been made through verbally with mill manager neither recorded in the grievance book, the complaint was still not resolved in an effective, timely and appropriate manner. Thus, nonconformity was raised due to ineffective and not solved during surveillance audit 2013.</p> <p>During this audit, it was found the complaints on expensive food price at Bukit Leelau mill's canteen which has been registered in the grievance book and minutes of meeting Gender Committee were also not resolved in an effective and timely manner.</p> <p>The minutes of meeting of "Mesyuarat Jawatankuasa Gender" dated 13th March 2014 and 25th July 2014 shows the issues were still raised.</p> <p>Consultation with Bukit Leelau mill's workers & gender committee confirms the issue was raised again but not resolved in an effective and timely manner.</p> <p>The corrective actions were not effectively implemented. Therefore this nonconformity was re-issued to major NCR # KN-1.</p>
	6.3.3	The system is open to any affected parties. <i>Minor</i>	Yes	<p><u>Detas and Merchong Estate</u> The system was open to all aggrieved parties. A perusal of the entries in the Green Book showed that estate communities as well neighbouring communities and the general public made use of the Green Book.</p> <p><u>Bukit Leelau POM</u> The system was open to all aggrieved parties and there is evidence that estate community as well neighbouring communities and the general public made use of the Green Book. The complaints and their outcomes were recorded and filed. The review of green book has to be with permission of Mill Manager and Social Liaison Officer.</p>

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	There was a specific procedure (11.0 Grievance Procedure for land Owner Issues) in place for identifying legal and customary rights and for identifying people entitled to compensation. The procedures for handling land ownership issues, boundary stones and squatter issues are all related to the process of identifying legal and customary rights and the compensation that they are entitled to.
	I 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 procedure for calculating and distributing fair compensation had been established' However there was no record of implementation as there has been no claim for compensation made against the Bukit Leelau CU. According to the procedure the calculation and distribution of compensation would be carried out at the company level not at the estate/mill level.
	I 6.4.3	The process and outcome of any compensation claims is documented and made publicly available. <i>Minor</i>	Yes	As to-date, there has been no claim for compensation made against the Bukit Leelau 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.	I 6.5.1	Documentation of pay and conditions. <i>Major</i>	Yes	The pay and conditions were stated and documented in the Offer of Employment given to all workers and staff at Bukit Leelau CU. The Offer of Employment for Foreign and Malay/Indonesian worker was written in the language (Bahasa, English and Myanmar language) that fully understood by the workers in order to avoid confusion or even charges of differential treatment.
	I 6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and	Yes	IOI was not a member of MAPA and so was not bound by the MAPA-NUPW and MAPA-AMESU CA. However there was a direct contract of employment detailing payments and conditions of employment documented in the Offer of Employment which the workers and staff had to read and sign, a copy of which

		<p>conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for 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.</p> <p><i>Minor</i></p>		<p>was given to the employee.</p> <p>The Offer of Employment for foreign and Malaysian workers was written in languages fully understood by the workers (Bahasa Melayu, English and Myanmar) in order to avoid confusion or even charges of differential treatment. During interviews with workers and staff they affirmed that that they understood the content of the Offer of Employment/Contract such as working hours, deductions and overtime, holiday entitlement and maternity leave. Content of the Offer of Employment was also explained to them by the estate Social Officer (a plantation management official in the operating unit nominated to handle social and communication issues).</p>
	I 6.5.3	<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).</p> <p><i>Minor</i></p>	Yes	<p>Adequate housing, water supplies, medical, educational and welfare amenities in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) had been provided by the estates for all workers (local and foreign). This was confirmed by the workers and staff interviewed and by a perusal of the reports made by the Visiting Medical Officer (VMO) and the estate Hospital Assistant (HA) who made monthly and weekly inspections (respectively) of the estate line sites. Observations made by the auditors during visits to the estate line sites and staff quarters also supported the views of the workers, staff, VMO and HA regarding adequacy of the amenities made available to the employees.</p> <p>Every house was supplied with electricity and free, safe potable water obtained from tube wells or the river. The water, after undergoing treatment, was analysed by a certified laboratory and by the Health Department and found to be safe for consumption. House repairs were carried out when requested and the surrounding area maintained. Dispensaries (headed by a Hospital Assistant) were found in every estate for use by all sick employees and their dependents. Serious cases were sent to the nearby government hospitals by company vehicle with all medical expenses paid by the company. The workers were also covered by workman's compensation. Recreational facilities such as football fields and badminton/volleyball/takraw courts were available and open for use by all workers and their families. The availability of the above facilities was confirmed through a perusal of the documents, interview of workers and field observations.</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 means of independent and free association and bargaining for all such personnel.	6.6.1	Documented minutes of meetings with main trade unions or workers representatives. <i>Major</i>	Yes	Estate workers were not members of any union. However minutes of meetings of workers representatives with plantation management were available in the minutes of the Employee Consultative Committee and Safety and Health Committee meetings. Only Bukit Leelau mill had form a National Union of Plantation Workers (NUPW) committee. Biennial meeting was held by the committee with main NUPW office at the Temerloh, Pahang. Minutes of meeting also was keeping by the NUPW mill's secretary and main office of NUPW. Interviews with employees and workers representatives revealed that they had understood the requirement of Criterion 6.6. Minutes of Meeting Internal stakeholder conducted on 8 September 2014 was verified.
	6.6.2	A published statement in local languages recognizing freedom of association. <i>Minor</i>	Yes	An official published statement in Bahasa Melayu/Indonesia and languages understood by the workers recognizing freedom of association (FOA) was available and exhibited in public places. The workers interviewed confirmed that they were aware of the FOA statement and of their right to join unions.
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	There was no record of persons under the age of eighteen, the minimum working age under Malaysian Labor Laws (Am. Act A1238) hired by the company. This was verified through an examination of the employment cards and employee master list. In addition workers interviewed also affirmed that no children worked on the estate. Neither were children seen on the estates during on site assessment. As the management of Bukit Leelau CU did not hire under-aged persons to work on the estate, the CU thus did not contravene the Children and Young Persons (Employment) Act 1966 (Act 350).
C 6.8	6.8.1	A publicly available equal	Yes	An equal opportunities policy was publicly made available in languages

Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		opportunities policy. <i>Major</i>		understood by all employees. Employees interviewed confirmed the existence of such a policy.
	6.8.2	Evidence that employees and groups including migrant workers have not been discriminated against. <i>Minor</i>	Yes	<p>Job openings were made available to any qualified person regardless of his/her socio-cultural, political or gender background. All workers (local or migrant, male or female) were covered by the same pay and conditions of employment associated with the jobs they are hired for. This was confirmed by an examination of the Offer of Employment to the employees and through consultations with workers.</p> <p>Memo on vacancies (<i>Jawatan Kosong Terbuka</i>) for local and “Foreign Workers Requirement Report dated 4th Sept 2014 was verified.</p> <p>The workers and staff were not discriminated against in any way and their rights not infringed, in accordance with Human Rights Commission of Malaysia Act 1999 (Act 597).</p>
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	<p>There was a published policy on sexual harassment and violence made available to employees in Bahasa Melayu, English and other languages spoken and understood by the employees.</p> <p>A gender committee whose responsibilities among others were to look into gender issues had been established in each estate assessed. Minutes of the committee meetings were filed in the Gender Committee file. The existence of this policy and its implementation was corroborated by female employees as well as members of the Gender Committee interviewed during the audit.</p>
	6.9.2	A specific grievance mechanism is established. <i>Major</i>	Yes	<p>There was a specific grievance mechanism to handle issues related to sexual harassment and violence. A gender committee whose responsibilities among others are to look into gender issues had been established in each estate/mill assessed. This was also confirmed by information gathered during consultations held with the female employees as well as members of the gender committee.</p> <p>Green Book to register complaints and <i>Carta Aliran Aduan</i> (complaint flowchart) was displayed at notice board.</p>
C 6.10 Growers and mills	6.10.1	Pricing mechanisms for FFB and inputs/services shall be	Yes	The prices offered by the mill had followed the MPOB's guidelines and payments were promptly made. A cross check made against the documentation

deal fairly and transparently with smallholders and other local businesses.		documented. <i>Major</i>		<p>i.e. agreement showed that the pricing mechanisms for FFB had been well documented.</p> <p>Currently, Bukit Leelau POM had received a small percentage of its FFB from one smallholder namely Ladang Manna Enterprise (owned by Abd. Muakhir Mohamad).</p> <p>Ladang Haji Harun had not sent its crop since July 2014. A notification letter from Ladang Hj Harun informing that Ladang Hj Harun is managed by new tenant since 8/7/2014 The tenant has no capacity to be in-compliance with most of the requirement and currently has no interest in complying with any sustainability related certification. Letter dated 18/8/2014 from sustainability and letter from Ladang Hj Harun dated 8/7/2014 regarding this issue was verified.</p> <p>Issues on payment were settled by Bukit Leelau management. The complainant Abdul Rahman bin Yahya (former tenant of Ladang Hj harun) satisfied with the explanation given by Bukit Leelau POM. The complaint has been acknowledged in Green Book. Therefore, the previous year's NCR (# MRS1) was effectively closed.</p>
	6.10.2	Current and past prices paid for FFB shall be publicly available. <i>Minor</i>	Yes	Current and past prices paid for FFB was placed at notice board near weighbridge at Bukit Leelau POM.
	6.10.3	Evidence that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. <i>Minor</i>	Yes	Suppliers and contractors interviewed affirmed that they fully understood the contractual agreement they entered into and that the contracts were fair, legal and transparent. No complaints or grievances were raised during the interview.
	6.10.4	Agreed payments shall be made in a timely manner. <i>Minor</i>	Yes	Suppliers and contractors interviewed affirmed that payments were made in a timely manner.
C 6.11 Growers and millers contribute to local sustainable development	6.11.1	Demonstrable contributions to local development that are based on the results of consultation with local communities. <i>Minor</i>	Yes	All the operating units under the Bukit Leelau CU had initiated consultations with their stakeholders including the estate (internal) as well as neighbouring (external) communities. This was evident from the SIA Reports and other records kept. Information obtained during the stakeholders' consultations in preparing the main and supplementary SIA as well as the 2013 review was

wherever appropriate.				used to work out a time bound social action plan, aimed at minimising negative impacts and maximizing positive ones and in this way help to contribute to local social development. An examination of the local development file and the social action plan incorporated in the SIA shows an improvement in the CU's contribution to local sustainable development.
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Principle 7: Responsible Development of New Plantings

Bukit Leelau CU has no plan for any new planting and no new development of area was observed during the visit. Therefore, Principle 7 is 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	Paraquat has been replaced by glyphosate in weeding operations at Bukit Leelau CU. Evidence sighted on the commitment to minimize the use of certain pesticides by implementing IPM such as planting of beneficial plant and increase no of barn owl boxes.
	8.1.2	Environmental impacts (C5.1). <i>Major</i>	Yes	Cross refer to Criterion 5.1.
	8.1.3	Maximizing recycling and minimizing waste or by-products generation. <i>Major</i>	Yes	Bukit Leelau CU is committed to minimizing waste by implementing the 3R practice. Records of recycled and reduced wastes were available for verification.
	8.1.4	Pollution prevention plans (C5.6). <i>Major</i>	Yes	Cross refer to Criterion 5.6.
	8.1.5	Social impacts (C6.1). <i>Major</i>	Yes	The main SIA carried out in 2009 was improved on by a supplementary SIA carried out in August 2013 in which demographic information of the estates in the Bukit Leelau CU were updated. The estates audited had also updated their stakeholder lists and social action plans (including the plans' implementation) for 2014. The yearly updating of the social action plan was the result of the annual stakeholders' consultation.
	8.1.6	A mechanism to capture the performance and expenditure	Yes	Mechanism to capture the performance and expenditure had been established and continued. Assessment on the records shows it was not limited to social

		in social and environmental aspects. <i>Minor</i>		and environmental aspects only but it also covered to occupational safety and health matters.
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RSPO Supply Chain at the palm oil mill – Segregation Model –Module D

Item No	Requirement	Findings
D.1 D.1.1	Documented procedures 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:	
	a) Complete and up to date procedures covering the implementation of all the elements in these requirements	Procedure is available: RSPO Supply Chain-Module D-CPO Mills: Segregation (RSPO SC/SOP/SG/2, Issue 02, dated 1/9/2012). The procedure covered both handling RSPO certified products under Segregation and Mass Balance models. The procedure, did not adequately address the guaranteed minimum standard of 95 % segregated physical material during receiving, process, storage and dispatch. Therefore an NCR was assigned due to this lapse. Bukit Leelau POM's however, did not adequately describe about handling non-certified FFB in its current supply chain procedure. Therefore, NCR # VS 1 was assigned due to this lapse.
	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.	Bukit Leelau Mill Manager (Mr. Chong Yew Keng) has been appointed to be the person having overall responsibility for and authority over the implementation of the supply chain requirements.
D.1.2	The facility shall have documented procedures for receiving and processing certified and noncertified FFBs.	Mechanism is stated in the procedure.
D.2 D.2.1	Purchasing and goods in The facility shall verify and document the volumes of certified and non-certified FFBs received.	BLPOM will only accept the RSPO certified FFB. Its main supply base are those IOI's own estates i.e. Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate and two certified smallholders, Ladang Manna and Hj. Harun. Some surrounding estates such as Leepang A Estate (IOI), Laukin A Estate (IOI) and Bebar Estate (Boustead) have also sent their crop once in a while to BLPOM. The assessor has verified the RSPO certificates

		<p>for the three estates and confirmed that their certification was still valid at the point of this assessment.</p> <p>The volume of its suppliers' contribution is verified and documented on daily basis by BLPOM. For the duration from September 2013 to August 2014 BLPOM has received 150,753.41 mt of RSPO certified FFB.</p>
D.2.2	The facility shall inform the CB immediately if there is a projected overproduction.	No overproduction of certified CPO or PK.
D.3 D.3.1	<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><u>Records of receiving FFB:</u></p> <ul style="list-style-type: none"> • Dispatch chit • Weighbridge ticket <p><u>Records of CPO dispatch:</u></p> <ul style="list-style-type: none"> • Weighbridge ticket • Collection order • Dispatch Chit • <i>Borang MPOB</i> • Gate Pass • FJB's Goods Receipt Note
D.3.2	Retention times for all records and reports shall be at least five (5) years.	Requirement is stated in the procedure Clause 7.2.1
D.3.3	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.	Records of FFB received and CPO & PK dispatch are recorded on daily basis and available for three monthly compilations.
D.3.4	The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/SG or Segregated. The supply chain model used should be clearly indicated.	Yes, model used is stated in the relevant documents.
D.4 D.4.1	<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> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The date on which the invoice was issued; c) A description of the product, including the applicable supply chain model (Segregated) 	The physical movement of the certified CPO is generally from Bukit Leelau POM to FELDA Johor Bulkurs (tank farm facility) to the buyers. The transaction handled by marketing department at IOI HQ and invoices were also issued by them.

	<p>d) The quantity of the products delivered;</p> <p>e) Reference to related transport documentation.</p>	
<p>D.5</p> <p>D.5.1</p>	<p>Processing</p> <p>The facility shall assure and verify through clear procedures and record keeping that the RSPO certified palm oil is kept segregated from non certified material including during transport and storage and be able to demonstrate that is has taken all reasonable measures to ensure that contamination is avoided. The objective is for 100 % segregated material to be reached. The systems should guarantee the minimum standard of 95 % segregated physical material⁹; up to 5 % contamination is allowed.</p>	<p>Procedure was found adequate. Since BLPOM did not accept any RSPO non-certified FFB, its processing activity can guarantee the minimum standard of 95% segregation physical material.</p>
D.5.2	<p>The facility shall provide documented proof that the RSPO certified palm oil can be traced back to only certified segregated material.</p>	<p>The existing documentation system is able to provide prove that the RSPO certified palm oil can be traced back to certified segregated FFB.</p>
D.5.3	<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:</p> <ul style="list-style-type: none"> • The crush operator conforms to these requirements for segregation • The crush is covered through a signed and enforceable agreement 	<p>Outsource only for CPO & PK Transportation. Before taking the CPO or PK, the AP will check the transport by using “<i>Senarai Pemeriksaan untuk Lori Minyak Kelapa Sawit & Trailer Kernel</i>” in term of cleanliness and opportunity to manipulate the weight.</p>
<p>D.6</p> <p>D.6.1</p>	<p>Training</p> <p>The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems.</p>	<p>Last training conducted was on 6/9/2014, entitled RSPO Supply Chain by the mill manager. Attended by 8 trainees from various operations such lab, weighbridge, grading, office attendant, security (auxiliary police) and engineers.</p>
<p>D.7</p> <p>D.7.1</p>	<p>Claims</p> <p>The facility shall only make claims regarding the use of or support of RSPO certified palm oil that are in compliance with the RSPO Rules for Communication and Claims.</p>	<p>RSPO Trademark has not been used for the certified product.</p>

3.1 Identified Non-conformance and Noteworthy Positive Components

The five major NCR raised during this surveillance assessment has been adequately addressed and therefore closed out. The level of awareness among the workers on the RSPO implementation was found to be improving. They are able to explain not only the operating procedure related to their work but also the impact of its deviation, the consequence for not following them and the importance in achieving conformity to the RSPO requirements.

4.0 Certified Organization's Acknowledgement of Internal Responsibility

Formal Sign-off of Surveillance Assessment Findings

5.0 Organization's Acknowledgement of Internal Responsibility

5.1 Date of Next Surveillance Visit

The next surveillance visit will be conducted within 12 months but not sooner than 9 months from this audit.

5.2 Formal Sign-off of Surveillance Assessment Findings

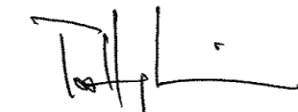
I, the undersigned, on behalf of **SIRIM QAS International Sdn. Bhd.** acknowledge and confirm the contents of the assessment report and findings of the assessment.



VALENCE SHEM
Lead Assessor

Date: 19/1/2015

I, the undersigned, **IOI Group, Bukit Leelau Certification Unit** acknowledge and confirm the contents of the assessment report and findings of the assessment.



Name : TOO HENG LIEW
Designation : Head Sustainability (Malaysia/Indonesia)
Date : 20/1/15

Location map of Bukit Leelau Certification Unit, Muadzam Shah, Pahang, Malaysia



Assessment Programme

Day One: 8th September 2014 (Monday)

Time	Hidhir	Dr. Zahid	Najwan	Valence
0900-0930	Opening Meeting, audit team introduction and briefing on audit objectives, scope, methodology, criteria and programmes by audit team leader			
0930-1000	Briefing on the organization implementation of RSPO (including action taken to address main assessment findings) and update on time bound plan progress			
1000-1300	Site visit and assessment at Bukit Leelau Estate relating to occupational safety & health and environmental aspects Assessment on related Indicators of P1, P2, P3, P4, P5, P8	Site visit and assessment at Detas Estate relating to social aspects Assessment on related Indicators of P1, P2, P6 and P8	Site visit and assessment at Bukit Leelau POM relating to social aspects Assessment on related indicators of P1, P2, P3, P6, P8	Verification on general requirements with IOI Sustainability Team or relevant units and verification of previous assessment finding at Ladang Manna and Hj. Harun
1300-1400	Lunch Break			
1400-1700	Continue assessment	Continue assessment	Continue assessment	Continue assessment

Day Two: 9th September 2014 (Tuesday)

Time	Hidhir	Dr. Zahid	Najwan	Valence
0900-1300	Continue assessment at Bukit Leelau Estate	Continue assessment at Detas Estate	Continue assessment at Bukit Leelau POM	Site visit and assessment at Detas Estate relating to Good Agricultural Practice and environmental aspects Assessment on related Indicators of P1, P2, P3, P4, P5, P8
1300-1400	Lunch Break			
1400-1700	Continue assessment	Continue assessment	Continue assessment	Continue assessment

Day Three: 10th September 2014 (Wednesday)

Time	Hidhir	Dr. Zahid	Najwan	Valence
0900-1300	Site visit and assessment at Bukit Leelau POM relating to Good Milling Practices, occupational safety & health environmental aspects Assessment on related Indicators of P1, P2, P3, P4, P5, P8	Site visit and assessment at Merchong Estate relating to social aspects Assessment on related Indicators of P1, P2, P6 and P8	Site visit and assessment at Bukit Leelau Estate relating to HCV, biodiversity, water management plan and environmental aspects Assessment on related Indicators of P1, P2, P4, P5, P8	Continue assessment at Detas Estate
1300-1400	Lunch Break			
1400-1700	Continue assessment	Continue assessment	Continue assessment	Continue assessment

Day Four: 11th September 2014 (Thursday)

Time	Hidhir	Dr. Zahid	Najwan	Valence
0900-1300	Continue assessment at Bukit Leelau POM	Continue assessment at Merchong Estate	Site visit and assessment at Detas Estate relating to HCV, biodiversity, water management plan and environmental aspects Assessment on related Indicators of P1, P2, P4, P5, P8	Site visit and assessment at Bukit Leelau POM relating to Supply Chain implementation including the model used
1300-1400	Lunch Break			
1400-1700	Continue assessment	Continue assessment	Continue assessment	Continue assessment

Day Five: 12th September 2014 (Friday)

Time	Hidhir	Dr. Zahid	Najwan	Valence
0830-1100	Audit Team discussion, preparation on audit findings and issuance of NCR (if any)			
1100-1230	Closing Meeting			

-END OF REPORT-

