



SIRIM QAS INTERNATIONAL SDN. BHD.
Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri,
Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref. : ED04270001

RSPO PUBLIC SUMMARY REPORT

CLIENT : Dara-Lam Soon Certification Unit

PARENT COMPANY : Lam Soon Cannery Private Limited

* Change of parent company and
RSPO membership no.

RSPO MEMBERSHIP No.: 2-0909-18-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):
(In the case of multisite certification, list additional sites in attachments) :

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
DARA LAM SOON CU	Dara Lam Soon Palm Oil Mill	03° 09.421' N	103° 09.818' E	92 km off Kuantan - Segamat Highway, 26700 Muadzam Shah, Pahang, Malaysia.
	Dara Lam Soon Estate	03° 09.406' N	103° 09.696' E	

MAP : See Attachment 1

AUDIT DATE : 16-18 January 2018

DURATION : 9 auditor days

TYPE OF AUDIT : ☒ Stage 2 Audit

☐ Recertification Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014

SCOPE OF CERTIFICATION: Production of Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 18 May 2018 – 17 May 2023

The following attachments form part of this report:

Non-conformity Report(s)

☒

List of additional site(s)

☐

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : ROZAIMEE BIN AB RAHMAN

Name : MOSDI B LATIF

Signature :

Signature :

Date : 18/05/2018

Date :

07/12/2018

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SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date :	16-18 January 2018		No. of auditor days :	12
Audit team :	Rozaimie Bin Ab Rahman, Mohd Zulfakar Kamaruzaman, Mohd Raof Bin Asis			
No. of major NCR :	9	Indicator: 5.2.1, 6.1.1, 6.1.2, 6.1.3, 2.1.1, 3.1.1, 4.1.1, 4.7.2, 5.1.1		Closing date : 16/4/2018
No. of minor NCR :	4	Indicator : 2.2.2, 4.3.3, 4.5.2, 4.4.1		
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	√		√	√
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
	√	√		
Supply base sampled :	Lam Soon estate			
Report approved by :	Radziah Mohd Daud		Approval date : 7/05/2018	

Annual Surveillance Audit 1				
On-site audit date :			No. of auditor days :	
Audit team :				
No. of major NCR :		Indicator:		Closing date :
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Report approved by :			Approval date :	

Annual Surveillance Audit 2				
On-site audit date :			No. of auditor days :	
Audit team :				
No. of major NCR :		Indicator:		Closing date :
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Report approved by :			Approval date :	

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Annual Surveillance Audit 3				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:	Indicator:	Closing date :	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Suppliers
		Contract workers	Govt. agency	Independent growers
		Indigenous people	Others (Please specify)	
Supply base sampled	:			
Changes since the last audit	:			
Report approved by	:			Approval date :

Annual Surveillance Audit 4				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:	Indicator:	Closing date :	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Suppliers
		Contract workers	Govt. agency	Independent growers
		Indigenous people	Others (Please specify)	
Supply base sampled	:			
Changes since the last audit	:			
Report approved by	:			Approval date :

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Jan 2018- Dec 2018				
Certified FFB Processed (MT)	110,645				
Production of Certified CPO (MT)	24,342				
Production of Certified PK (MT)	5,532				
Certified Areas (Ha)	4,220				
Planted Areas (Ha) (<i>Mature + Immature area</i>)	4,109				
Production Areas (Ha) (<i>Mature area only</i>)	4,096				
HCV Areas / Conservation Areas (Ha)	11				
REMARKS	-				

TABLE 2

	PO	PK
Last years certified volume (MT)	NA	NA
Last years actual certified sold (MT)	NA	NA
Last years actual sold under other schemes (MT)	NA	NA
Last years sold conventional (MT)	NA	NA
New year certified volume (MT)	24,342	5,532

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3.5	Any new acquisition which has replaced primary forests or HCV areas	10
3.6	Other changes (e.g. organizational structure, new contact person, addresses, etc.)	10
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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the 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 and nationally 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) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits 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 audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimiee Ab. Rahman	Lead Auditor Environment and occupational health and safety	Holds a B. Sc. Of Agriculture. He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C.
Mohd Ab Raouf bin Asis	Auditor Good Agricultural Practices (GAP)	Holds B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C.
Mohd. Zulfakar Kamaruzaman	Auditor HCV & Environment in Estates and Certification System Requirements	Holds a B. Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation. He has been trained as a RSPO Lead Auditor.

1.3 Audit methodology

The audit covered the 1 palm oil mill and 1 of supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The 1 supply base covered during the audit are Dara Lam Soon Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 15 December 2017. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Dara Lam Soon Sdn Bhd. is one of the subsidiary under the Lam Soon (M) Berhad and incorporated on 1975 under the name Dara Lam Soon Sdn. Bhd. The core business for Dara Lam Soon Sdn Bhd is Palm Oil plantation. The Dara Lam Soon Certification Unit (hereafter referred to as Dara Lam Soon CU) is the certification unit (CU) which had been undergo to RSPO P&C MYNI 2014 and RSPO Supply Chain certification and become RSPO Member on 3 June 2016. Dara Lam Soon POM is managed by Lam Soon Plantation Sdn Bhd and consisted of the Lam Soon POM (LSPOM) and Dara Lam Soon Estate that with two divisions; North and South estates divisions.

The palm oil mill commenced operations in 1980 with a processing capacity of 30 metric tons of fresh fruit bunches (FFB) per hour, All the estate within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable.

2.2 Description of the Supply Base (including the planting profile)

The FFB is sourced from company owned estate which is Dara Lam Soon Estate (formerly known as Merba Estate)

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Projected FFB production by the supply base for the next reporting period
(January 2018 – December 2018)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Dara Lam Soon Sdn Bhd	110,645	100	SIRIM QAS

Table 2: Projected CPO and PK tonnage for the next reporting period (January 2018 – December 2018)

	Total (MT)
FFB Received	110,645
FFB Processed	110,645
Certified FFB	110,645
Non Certified FFB	-
CPO Production	24,342
PK Production	5,532
CPO delivered as Identity Preserved	24,342
CPO delivered as non-RSPO certified	-
PK delivered as Identity Preserved	5,532
PK delivered as non-RSPO certified	-

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Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(January 2017 - December 2017)

	Total (MT)
FFB Received	110,645
FFB Processed	110,645
CPO Production	24,342
PK Production	5,532
CPO delivered as Mass Balance / IP	nil
CPO delivered as non-RSPO certified	24,342
PK delivered as Mass Balance /IP	nil
PK delivered as non-RSPO certified	5,532

Table 4 Planted and certified area of Dara Lam Soon

Estate	Planted (ha)	Certified (ha)
Dara Lam Soon Sdn Bhd	4,109	4,220
Total	4,109	4,220

Table 5(a) Planting profile for North Estate Division

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1997	1 st	Mature	19	0.85
1999	2 nd	Mature	221	9.75
2000	2 nd	Mature	5	0.22
2001	2 nd	Mature	215	9.48
2002	2 nd	Mature	203	8.95
2004	2 nd	Mature	380	16.76
2005	2 nd	Mature	152	6.70
2006	2 nd	Mature	9	0.40
2007	2 nd	Mature	466	20.56
2009	2 nd	Mature	597	26.33
Total			2,267	100

Table 5 (b): Planting profile for South Estate Division

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2001	2 nd	Mature	248	13.46
2002	2 nd	Mature	322	17.48
2003	2 nd	Mature	198	10.75
2004	2 nd	Mature	329	17.86
2005	2 nd	Mature	636	34.53
2007	2 nd	Mature	89	4.83
2009	2 nd	Mature	7	0.38
2015	2 nd	Immature	13	0.71
Total			1,842	100

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2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Jerome Lai Gim Nyeon / Yap Fabian
Position	:	(Mill Manager / Estate Manager)
Address	:	92 km off Kuantan - Segamat Highway, 26700 Muadzam Shah, Pahang, Malaysia.
Phone no.	:	09-4525086 / 09-4525093
Fax no.	:	09-4525087 / 09-4525092
Email	:	dlpom2013@gmail.com / yapfabian@gmail.com

3.0 AUDIT FINDINGS

3.1 Changes to certified products in accordance to the production of the previous year

There was no change to the certified products.

3.2 Progress and changes in time bound plan

- i. Have all the estates under the parent company been certified? ☒ Yes ☐ No

If no, comments on the organization's compliance with the RSPO partial certification rules :

-

- ii. Are there any changes to the organization's time bound plan? ☐ Yes ☒ No

If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

-

- iii. Are there associated smallholders (including scheme smallholders) in the CU ☐ Yes ☒ No

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? ☐ Yes ☒ No

If no, please state reasons

-

- iv. Any new acquisition which has replaced primary forests or HCV areas ☐ Yes ☒ No

3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)

No changes observed.

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3.4 Status of previous non-conformities *

* Not applicable.

☐

Closed

☐

Not closed*

3.5. Complaint received from stakeholder (if any)
No complaints from stakeholders were observed.

4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s)
(details refer to Attachment 4) List : 4

Total no. of major NCR(s)
(details refer to Attachment 4) List : 9

4.2 For SC (Details checklist refer to Attachment 5) :

Total no. of minor NCR(s)
(details refer to Attachment 5) List : NA

Total no. of major NCR(s)
(details refer to Attachment 5) List : NA

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

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6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.

Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .

☒

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.

☒

Recommended to continue certification.

☐

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

7.0

IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader : ROZAIMEE BIN AB RAHMAN

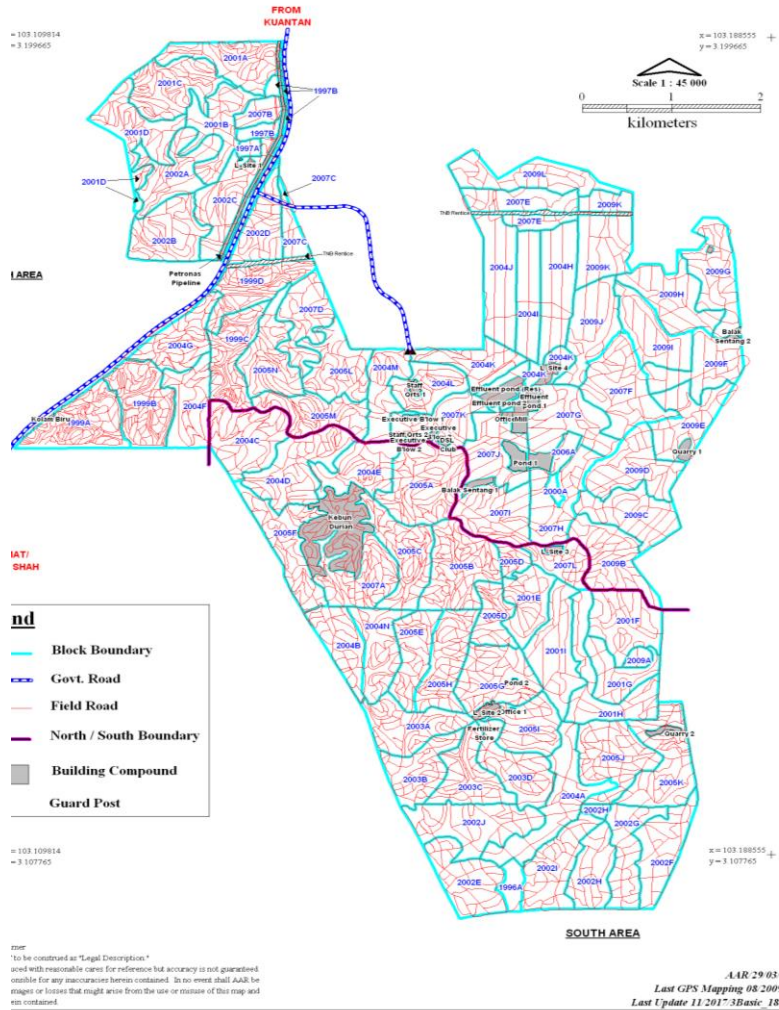
(Name)



(Signature)

16/04/2018

(Date)



**SIRIM QAS INTERNATIONAL SDN. BHD.
STAGE 2 AUDIT PLAN**

1. Objectives

The objectives of the assessment are as follows:

- (i) To evaluate **Dara Lam Soon Certification Unit** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- (ii) To verify the effective implementation of corrective actions arising from the findings of last assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. Date of assessment : 16-19 January 2018

3. Site of assessment : Dara Lam Soon CU

- Lam Soon Palm Oil Mill
- North Estate Division
- South Estate Division

4. Scope of certification : Production of Crude Palm Oil and Palm Kernel Using Identity Preserved

5. Reference Standard :

- RSPO P&C MYNI:2014
- RSPO Supply Chain Standard November 2014
- Company's audit criteria including Company's Manual/Procedures

6. Assessment Team :

- Rozaimie Bin Ab Rahman (Safety, Env)
- Mohd Zulfakar Kamaruzaman (HCV, Sosial, SCS)
- Mohd Raof Bin Asis (GAP, Safety)

If there is any objection to the proposed audit team, the organization is required to inform the Lead Assessor/RSPO Section Manager.

7. Audit Method
Site audits including observation of practices, interviews with interested parties (employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings
Audit finding shall be classified as major and / or minor

9. Confidentiality Requirements
SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain. In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia and other local languages (if there is a need)

11. Reporting

a) Language : English
b) Format : Verbal and written
c) Expected date of issue : Thirty days after the date of assessment
d) Distribution list : client file

12. Facilities Required

- Room for discussion
- Relevant document and record
- Personnel protective equipment if required
- Photocopy facilities
- A guide for each assessor

13. Assessment Programme Details : As shown below

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Day 1: 16/01/2017

Time	Activities / areas to be visited			Auditee
8.30 a.m. - 9.00 a.m.	Opening Meeting at Lam Soon Palm Oil Mill Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes.			
9.00 a.m.	<ul style="list-style-type: none"> Briefing on the organization background and implementation of RSPO at CU (including actions taken to address Stage I assessment findings) by company Management Representative. Logistics discussion to the sites to be visited. 			Management Representative
	Rozaimae POM	Raof North Estate Division	Zulfakar POM	
9.20 a.m.	Travel to Supply base			Auditee
10.00 a.m.	Documentation and records review at CU (including verification on action taken to address Stage 1 assessment findings).			Guide(s) for each assessor
	Continue coverage of assessment: P1, P2, P4, P5, P8 <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interviews with mill's workers Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes. Continuous improvement Facilities at workplace (water treatment plant, clinic & etc) Training and skill development programmes Local sustainable development Continuous improvement Other area identified during the assessment	Coverage of assessment: P1,P2,P3,P4,P7,P8 <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Nursery (if any) Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. Riparian zone River system and Water bodies Management and disposal of waste including pesticides containers New planting Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P5, P6, P8 <ul style="list-style-type: none"> Inspection of protected sites with HCV attributes Forested area Plantation Boundary, adjacent and neighbouring land use Riparian zone River system and Water bodies Source of water supply New planting Continuous improvement Supply chain assessment Other area identified during the assessment	Guide(s) for each assessor
1.00 p.m.	LUNCH BREAK and SOLAT			All
2.00p.m.	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each assessor
4.30 p.m.	Discussion among team members / end of Assessment of Day 1			Audit members

Day 2: 17/01/2018

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Time	Activities / areas to be visited			Auditee
	Rozaimée POM	Raof North Estate Division	Zulfakar POM	
8.00 a.m. – 1.00 p.m.	Documentation and records review at CU (including verification on action taken to address Stage 1 assessment findings).			Guide(s) for each assessor
	Continue coverage of assessment: P1, P2, P4, P5, P8 <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interviews with mill's workers Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes. Continuous improvement Facilities at workplace (water treatment plant, clinic & etc) GHG assessment Other area identified during the assessment	Coverage of assessment: P1,P2,P3,P4,P7,P8 <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Nursery (if any) Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. Riparian zone River system and Water bodies Management and disposal of waste including pesticides containers New planting Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P5, P6, P8 <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans. <ul style="list-style-type: none"> Laws and regulations Land titles user rights Local communities and stakeholders Interview with Union representatives Workers Issues Facilities at workplace (rest area, etc) Line site Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) New planting Continuous improvement Other area identified during the assessment	Guide(s) for each assessor
1.00 p.m.	LUNCH BREAK and SOLAT			All
2.00 p.m. -4.30 p.m.	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each assessor
4.30 p.m.- 5.00 p.m.	Discussion among team members / end of Assessment of Day 2			Audit members

Day 3: 18/01/2017

Time	Activities / areas to be visited			Auditee
	Rozaimée North Estate Division	Raof South Estate Division	Zulfakar North Estate Division	
8.00 a.m. – 1.00 p.m.	Documentation and records review at CU (including verification on action taken to address Stage 1 assessment findings).			Guide(s) for each assessor

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	<p>Continue coverage of assessment: P1, P2, P4, P5, P8</p> <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interviews with estate workers Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes. Continuous improvement Facilities at workplace (water treatment plant, clinic & etc) Training and skill development programmes Local sustainable development Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1,P2,P3,P4,P7,P8</p> <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Nursery (if any) Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. Riparian zone River system and Water bodies Management and disposal of waste including pesticides containers New planting Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1, P2, P5, P6, P8</p> <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. <p>Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans.</p> <ul style="list-style-type: none"> Laws and regulations Land titles user rights Local communities and stakeholders Interview with Union representatives Workers Issues Facilities at workplace (rest area, etc) Line site Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) New planting Inspection of protected sites with HCV attributes Forested area Plantation Boundary, adjacent and neighbouring land use Riparian zone River system and Water bodies Source of water supply Continuous improvement <p>Other area identified during the assessment</p>	<p>Guide(s) for each assessor</p>
1.00 p.m.	LUNCH BREAK and SOLAT			All
2.00 p.m. - 4.30 p.m.	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each assessor
4.30 p.m. - 5.00 p.m.	Discussion among team members / end of Assessment of Day 3			Audit members

Day 4: 19/01/2017

Time	Activities / areas to be visited			Auditee
	Rozaimie South Estate Division	Raof South Estate Division	Zulfakar South Estate Division	
8.00 a.m. – 1.00 p.m.	Documentation and records review at CU (including verification on action taken to address Stage 1 assessment findings).			Guide(s) for each assessor

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	<p>Continue coverage of assessment: P1, P2, P4, P5, P8</p> <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interviews with estate workers Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes. Continuous improvement Facilities at workplace (water treatment plant, clinic & etc) Training and skill development programmes Local sustainable development Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1,P2,P3,P4,P7,P8</p> <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Nursery (if any) Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. Riparian zone River system and Water bodies Management and disposal of waste including pesticides containers New planting Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1, P2, P5, P6, P8</p> <ul style="list-style-type: none"> Follow up from Stage 1 assessment findings. Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans. Laws and regulations Land titles user rights Local communities and stakeholders Interview with Union representatives Workers Issues Facilities at workplace (rest area, etc) Line site Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) Inspection of protected sites with HCV attributes Forested area Plantation Boundary, adjacent and neighbouring land use Riparian zone River system and Water bodies Source of water supply Continuous improvement <p>Other area identified during the assessment</p>	<p>Guide(s) for each assessor</p>
1.00 p.m. – 2.00 pm	LUNCH BREAK and SOLAT			All
2.00p.m. -3.30 p.m.	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each assessor
3.30 p.m.- 4.30 p.m.	Discussion among team members			Audit members
4.30p.m – 5.00 p.m	Closing meeting / audit findings			All

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Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicators		Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	Yes	The CU has implemented procedure for responding to any communication as outlined in their Estate/Mill Quality Management System documents. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees. DLS recognize efforts to nurture long-term sustainability and commitment to the environment is reflected in very practices and policies which entails best practices, care for the environment and managing the social aspects. Among the policy established to address their commitment in managing the environment safety and social are: <ul style="list-style-type: none"> • Environmental Policy • Social Policy • Occupational Safety & Health Policy • Ethical Business Conduct The CU continued to use their website for disseminating public information. Information relating to land titles, Policies, complaints and grievances are available at http://lamsoonplantations.com.my
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	Yes	The estates had identified personnel responsible for handling of complaints. Records of communication were maintained at the respective offices. The internal communication is recorded in 'Buku aduan'. For external communication the mill have request and responses logbook, stakeholder consultation logbook, records of correspondences with Government Departments were sighted.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative	1.2.1	Land titles/user rights;	Yes	The right to use the land at Dara Lam Soon CU clearly demonstrated and not disputed by any party. Documents related to land ownership i.e. land titles and payment of quit rent were made available at the respective visited offices.
		Occupational health and safety plans;	Yes	Occupational Health & Safety Plan titled 'Occupational Safety & Health Plan 2018' has been established. Indicators set in the plan are being monitored. The audit on the progress monitoring of the programs identified is as in C 4.7 below.
		Plans and impact assessments relating to environmental and social impacts;	Yes	Environmental and social impact assessment, management action plans, and continuous improvement plan for Dara Lam Soon Estate / Mill maintained available by the CU.
		HCV documentation summary;	Yes	The CU maintained made available documented HCV summary, which displayed at notice board.

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Clause	Indicators		Comply Yes/No	Findings
environmental or social outcomes.		Pollution prevention and reduction plans;	Yes	The list of waste generated from estate and mill activities maintained available. All sources of pollution have been identified by management. Mitigation measure and action taken also made available. Among of activities covered include nursery, growing, drainage, planting, fertilizing, scheduled waste and mill operation.
		Details of complaints and grievances;	Yes	No complaint or grievances were observed.
		Negotiation procedures;	Yes	Negotiation procedure maintained available.
		Continual improvement plans;	YES	Dara Lam Soon CU continued committed to utilize the established system to regularly monitor and review their key activities at the estates, and initiated the relevant action plans for continuous improvement in its key areas of operations on environmental, safety, health and welfare as well as social contribution to workers and community.
		Public summary of certification assessment report;	Yes	The public summary will be made publicly available after certification at website by SIRIM QAS.
		Human Rights Policy;	Yes	The human rights policy maintained available. The policy is posted at office notice boards.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	Yes	The documented policy committing to a code of ethical conduct and integrity of the company maintained available. The CU continued communicated the policy to their staffs including foreign workers during the induction course.

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 & regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	NO	In general, Dara Lam Soon CU continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licenses and permits were verified at Dara Lam Soon CU and it can be confirmed that all document are valid. These document were reviewed at Lam Soon CU; Registry of companies, MPOB license, Suruhanjaya Tenaga license, KPDNKK purchase and storage of diesel for the estate and MPOB license, Suruhanjaya Tenaga License, DOE license, License for use water sources. These regulations compliance were also reviewed: 1) Factory and Machinery Act 1967 –

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Clause	Indicators		Comply Yes/No	Findings
				<p>i) <i>Person In Charge Regulation 1970</i> ii) <i>Steam Boiler and Unfired Pressure Vessel 1970</i> iii) <i>The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2) CF</i> iv) <i>Noise Exposure Regulations 1989</i> Audiometric test was carried out Jan 2017 and retest on May 2017 by a registered OHD. The test report indicated that some employees were identified with hearing impairment and need to go for retest. However the required was not carried out and Major NCR RAR 03 has been raised. 2) EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 Noted that leachate has been sighted from the EFB stock yard, flowing into the monsoon drain. Thus, #Major NCR MZK 06 2018 has been raised. 3) Section 49A EQA 1974 amendment 2014 4) Scheduled Waste Regulations 2005 5) OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000 CHRA) for Dara Lam Soon POM was conducted in Oct 2014. Based on the recommendation of the assessor, it was found that the Chemical Exposure Monitoring (CEM) was not conducted as per recommended. Major NCR RAR 03 has been raised to address this. It was also noted that these non-conformities were sighted during audit and was recorded in Major NCR RAR 03 2018: In Dara Lam Soon Estate, the location of gen set was near to the house and will be an impact to the residency and skid tank bund was not properly design at Bandar 12.</p>
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	Document titled "List of Legal Register" maintained available at Dara Lam Soon POM and South & North Estate Division. The document last updated in Dec 2017 by Sustainability Department.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Dara Lam Soon CU maintained its mechanism for ensuring all the applicable legal requirements are implemented. The mechanism are by: Evaluation of compliance exercise against the legal register by Sustainability Executive and comments from the visiting engineer.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	The CU maintained documented system for identifying and tracking the updates of the applicable legal requirements through various media such as LawNet, internet, newsletter, etc. The legal register management noted had been update accordingly. All the new amendment of applicable regulations were included in the legal register.
C 2.2	2.2.1	Documents showing legal	YES	Lam Soon CU maintained and complied with the terms of the land title the. Observed that

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Clause	Indicators		Comply Yes/No	Findings
The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised Native Customary Right (NCR) land) and the actual legal use of the land shall be available. Major Compliance		the land titles are owned by Teras Dara Konsortium and the ownership of the land has been sold to Dara Lam Soon Sdn Bhd on year of 1975. The Land title also specify the purpose of the planting for either oil palm or agricultural crops for economic value. Noted that some of the land title are country Lease and some are fully owned by the Company. The land titles were available at the Mill and estate office and were reviewed accordingly.
	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	NO	It was found that, there were no physical markers along the legal boundaries between Lam Soon Estate and Kampung Terubin and Kampung Orang Asli. A minor NCR MZK 01 2018 was raised.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). Minor Compliance	YES	Based on interviews with Orang Asli Head and representatives from the neighboring villages and records that were available during audit, there is no evidence of any land dispute at Dara Lam Soon CU.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. Major Compliance	YES	Based on interviews with Orang Asli Head and representatives from the neighboring villages and records that were available during audit, there is no evidence of any land dispute at Dara Lam Soon CU.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties	YES	Based on interviews with Orang Asli Head and representatives from the neighboring villages and records that were available during audit, there is no evidence of any land dispute at Dara Lam Soon CU.

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Clause	Indicators		Comply Yes/No	Findings
		(including neighbouring communities and relevant authorities where applicable). Minor Compliance		
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	Based on interviews with Orang Asli Head and representatives from the neighboring villages and records that were available during audit, there is no evidence of the oil palm operations that have instigated violence in maintaining peace and order in their current and planned operations.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior, and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). Major Compliance	YES	Dara Lam Soon CU was developed since 1974. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office and was verified by the auditor. There are no land issues with the villagers, local community and neighboring estate. Generally the use of the land for oil palm does not diminish the legal, or customary, or user right of other users at the point of used in 1974.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:	YES	Dara Lam Soon CU was developed since 1974. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office and was verified by the auditor. There are no issue regarding land with villagers, local communities and neighboring estate. Generally the use of the land for oil palm does not diminish the legal, or customary, or user right of other users at the point of used in 1974.
	a)	Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision-making;		
	b)	Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this		

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Clause	Indicators	Comply Yes/No	Findings
	<p>decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance</p>		
	<p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance</p>	YES	Dara Lam Soon CU was developed since 1974. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office and was verified by the auditor. There are no issue regarding land with villagers, local communities and neighboring estate. Generally the use of the land for oil palm does not diminish the legal, or customary, or user right of other users at the point of used in 1974.
	<p>2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance</p>	YES	Dara Lam Soon CU was developed since 1974. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office and was verified by the auditor. There are no issue regarding land with villagers, local communities and neighboring estate. Generally the use of the land for oil palm does not diminish the legal, or customary, or user right of other users at the point of used in 1974.

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

Clause	Indicators	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	<p>3.1.1 A business or management plan (minimum three years) shall be documented. That includes, where appropriate, a business case for scheme smallholders. Major Compliance</p>	NO	A business or management plan did not documented the minimum three years and the present business management plan did not comprehensively include other expenditure details. Therefore, major NCR was raised as in NCR MAR 01 2018.
	<p>3.1.2 An annual replanting programme projected for a minimum of five years (but longer where</p>	YES	It has been confirmed that there were no replanting program due to no replanting projected for the next five (5) years in both South & North Estate Division.

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Clause	Indicators	Comply Yes/No	Findings
	necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance		

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

Clause	Indicators	Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	NO	Dara Lam Soon CU adopted the following documented manuals and documents as their standard operating procedures: 1. Oil Palm Agricultural Policy (OPAP). 2. Safety Operating Procedure. Among the estate operations covered by the procedures were harvesting, oil palm nursery, land clearing and preparation, planting technique, cover crop, fertilizer application, weeding, pest and disease, harvesting and crop evacuation, road maintenance, workshop, foliar sampling etc. The versions of procedures in Bahasa Malaysia were made available in office, muster ground, general store, chemical stores notice & sign boards. Safety procedure sign boards were also noticed placed in various places like in line site and in the fields. However, it was noted that the SOPs were not available at Dara Lam Soon Palm Oil Mill. Therefore, major NCR was raised in NCR MAR 02 2018.
	4.1.2 A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	There were mechanism in place to check consistent implementation of procedures. Among the mechanism verified were the Agronomist Report, the Internal audit on RSPO compliance and the Visiting Engineer report-Dara Lam Soon POM.
	4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	Yes	Relevant records on implementation and monitoring of OPAP etc at the CU were clearly verified. Among the records sighted were: Program sheets, Field cost books, Agronomic reports, Audits by Sustainability Officers, Harvesting Interval records, Rat baiting records, Fertiliser application records, Monthly Progressive Reports, scheduled wastes records, PPE Checklist etc. Most records are being maintained for more than a year and some much longer.
	4.1.4 The mill shall record the origins of all third-party sourced FFB. Major Compliance	Yes	Auditor has verified through weighbridge ticket and interviewed with weighbridge clerk, and confirmed that no third party FFB supplier send their fruit to Lam Soon POM. The POM only received FFBs from its own supply base and will be implementing the Identity Preserved (IP) supply chain model.
C 4.2 Practices maintain soil fertility at or,	4.2.1 There shall be evidence that good agriculture practices, as contained in SOPs, are	Yes	Both estates continued to practice the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB application.

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Clause	Indicators		Comply Yes/No	Findings
where possible, improve oil fertility to a level that ensures optimal and sustained yield.		followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance		Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by appointed third party. Annual fertiliser recommendations were made based on annual foliar sampling which has been carried out in Feb 2017. Soil sampling was carried out yearly in the fields which also done in Feb 2017.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser inputs were based on recommendation by appointed third party, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilisers were available. Records showed that actual applied in 2017 was in line with recommendations in both estates.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Periodic tissue and soil sampling had carried out in Dara Lam Soon CU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. Foliar sampling were carried out in Feb 2017 and leaf analysis were in Sept 2017, in Dara Lam Soon Estate (North and South Division) by appointed third party.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Both estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose. EFB were also applied. EFB applied in the mature area.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	There were no fragile/marginal soils in both estates visited based on the soil maps provided sourced from appointed third party.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	Dara Lam Soon CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes was guided by its Oil Palm Agriculture Policy. Among the methods were construction of conservation terraces, cambered roads & side drains, roads to bisect the terraces, construction of sump at the downslope and cover crop establishment. It was observed in mature areas that slopes were terraced. The terrain in both estates was mainly flat and undulating with no slopes above 25°. It was observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crop was observed planted in the replants and in some mature areas. No bare ground was sighted during the visit.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	NO	During the field visit at field 2001A North Division Estate, it was observed that the main and field roads of Dara Lam Soon CU showed signs of inconsistent road maintenance. Therefore, minor NCR was raised in NCR No MAR 03 2018.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover	YES	No peat soil noticed in South & North Division Estate. It was supported with soil map provided by estate.

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Clause	Indicators		Comply Yes/No	Findings
		management programme shall be in place. Major Compliance		
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	No peat soil observed in South & North Division Estate. This has been confirmed with soil map provided.
	4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils). Minor Compliance	YES	No peat soil observed in South & North Division Estate. This has been confirmed with soil map provided by estate.
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	An implemented water management plan shall be in place. Minor Compliance	NO	<p><u>Dara Lam Soon POM</u> The water management plan, updated as at Jan 2018. Among of the water management plan for Dara Lam Soon POM were:</p> <ul style="list-style-type: none"> To monitored water quality - to carried out water sampling twice a year and send to Allied Chemist Laboratory Sdn Bhd Water pollution monitored - to provided spill kits and tray in the workshop, to construct oil trap at workshop and parking bay, contaminated waters were collect and disposed as a schedule waste Treated water - monitored every piping linkages to prevent leakages from occurs Water storage / catchment - cleaning water tank 1 per year To located landfill which located more than 100m from the residential areas. <p>Among of water management plan for estates were:</p> <ul style="list-style-type: none"> Optimize usage and reduce wastage of water - water usage are minimize by converting the separated type of water into all in one spray e.g. strip, wooden, and VOP"s were spray in one round. Flood area / water logging area - action plan desilting drain carried out as per scheduled and to monitored water level Sump pit (water conservation) - constructed sump pit at the road side and step slope to prevent soil erosion and to conserve water. <p>It has been noted that the POM treatment water analysis by external laboratory has a negative results (acidic) but, there was no action taken to address the issues. Hence, Minor NCR RAR 04</p>

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Clause	Indicators	Comply Yes/No	Findings
			was raised to highlight the issue.
	4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. Major Compliance	YES	During site visit made, a signboard was erected to protect the riparian buffer zone. The management have clearly demarcate the area and the signboard clearly indicate no activities of encroachment, chemical spraying, manuring, fishing, open burning, throwing rubbish and farming. It was observed that no sign of spraying and manuring at the riparian buffer zone.
	4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	An Effluent Treatment Plant (ETP) is available at TPOM to treat the POME. According to DOE's license, the disposal method of the final discharge is through water irrigation. The ETP is regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on weekly basis and sent to an accredited laboratory for analysis. The results of analysis were submitted to the DOE on quarterly basis.
	4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) shall be monitored. Minor Compliance	YES	Processing water obtained from water catchment pond. The water consumption at the mill was monitored on monthly basis, recorded between 2.03 to 2.81 litre/MT FFB processed. A slight inconsistent trend was noted. This was due to cleaning process in the mill.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1 Implementation of IPM plans shall be monitored. Major Compliance	YES	Dara Lam Soon CU continued to implement IPM in South & North Division Estates. Both estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the OPAP Pests and Diseases. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps. In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. Rat damage and leaf-eating pest census had regularly carried out to obtain information about threshold level and action to be taken thereafter.
	4.5.2 Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	NO	Training of those involved in IPM implementation cannot be demonstrated. There were no evidence of training for those involved in IPM implementation. Therefore, minor NCR was raised in NCR MAR 04 2018.
C 4.6 Pesticides are used in ways that do not	4.6.1 Justification of all pesticides used shall be demonstrated. The use of selective	YES	The use of all agrochemicals by the estates was guided by its OPAP Upkeep of Mature oil palm and Safety Standard Procedure where written justifications had been provided. The manual had included a chemical register list which indicates the purpose of usage, hazards signage, trade and

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Clause	Indicators	Comply Yes/No	Findings
endanger health or the environment.			generic names.
	4.6.2	YES	Both visited estates maintained records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used. The total quantity used, number of applications and active ingredients (ai) per Ha were also recorded. These includes mature and immature areas. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports.
	4.6.3	YES	As part of the IPM plans, management of both estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During visits to the site, noted that a number of beneficial plants were planted. Both estates had plants ready for planting at the Nurseries. There was no evidence on prophylactic use of pesticides in both estates.
	4.6.4	YES	Both estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised by World Health Organisation as Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, had been used in 2016 and 2017.

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Clause	Indicators	Comply Yes/No	Findings
	are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance		
	4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance	YES	Records showed that pesticides were handled, used and applied by trained personnel and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the CSDS training. It was also noted that CSDS are available at South & North Division Estate sites.
	4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	YES	The chemical stores in both estates 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. Record of the purchase, storage and use had been properly maintained. All of the stores had been well ventilated, had exhaust fans and secured. Only authorized personnel were allowed to handle the chemicals. All the chemicals were stored and segregated accordingly.
	4.6.7 Application of pesticides shall be by proven methods	YES	Pesticide applications were guided by OPAP manual, CHRA and by SDS supplied by the manufacturer. The CHRA for both estates was reviewed in June 2016 by the appointed third party.

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Clause	Indicators	Comply Yes/No	Findings
	that minimise risk and impacts. Minor Compliance		
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying of pesticide was not practiced by South & North Division Estate and there was no evidence to show that any had been carried out.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance	YES	The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat bait were continuously trained. The training were regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification. Random interviews with the workers showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner.
4.6.10	Proper disposal of waste material, according to procedures that are fully-understood by workers and managers shall be demonstrated. Minor Compliance	YES	For both POM and estate scheduled wastes', the SW was disposed to a DOE approved contractor and the consignment notes for the disposal were reviewed.
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	For Dara Lam Soon CU, medical surveillance was conducted by an DOSH approved OHD for mill workers involved in operation such as electrician, driver shovel, laboratory, workshop, boiler, store keeper, kernel plant operator and the estates employees. The results from this assessment showed that all workers were fit to handling chemicals. As for the estates workers, to those identified as workers who exposed to organophosphate following recommendation by CHRA were confirmed to have no significant exposure to organophosphate and can continue performing the job.
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	Lam Soon had established "Polisi Pekerja Wanita" dated in Feb 2017. The policy states that no pregnant women or breast-feeding women to work as sprayer or chemical handler. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estate. The interviewed workers were aware that pregnant and breast-feeding women should not handle chemicals.

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Clause	Indicators		Comply Yes/No	Findings
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	For Dara Lam Soon POM, Occupational Safety and Health Policy, signed by the Plantation Director was available at the sites. The policy was available in English and Bahasa Malaysia and were communicated to all employees through briefings by the OSH representatives. The policy was also displayed on the notice boards. The Occupational Safety & Health Plan 2018 was updated in Jan 2018. The OHS management plan addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, etc. Generally, the OSH program noted to be satisfactory.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	NO	At Dara Lam Soon POM, the HIRARC was last updated in Aug 2017. Among the activities updated in HIRARC was related to working at effluent treatment plant. Appropriate risk control measures had been determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative control such as safety signage was displayed at all work stations in the mill and estates. In general, the OSH administrative controls implementation as well as engineering control equipment were found adequate. However it was noted that at Dara Lam Soon Estate, hazards in working at orchard areas was not being identified and 5 accidents occurred in year 2017 was not reviewed by the OSH committee. Thus Major NCR RAR 01 2018 has been raised.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Appropriate PPEs were identified through HIRARC exercise and have been provided accordingly to the affected workers. When interviewed, it was confirmed that they were aware of all precautions and safety requirements. During visit at POM and estates, noted that all workers were aware of using of PPE. Based on the HIRARC carried out at Dara Lam Soon Estate and POM, the types of PPE for various job were identified using the 'Daily Safety Checklist'. The management had carried out daily inspection for PPE to all workers by daily basis.
	4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings	YES	Safety and Health Committee Organisation Chart has been established with workers and Management representation. The committee is chaired by the Mill and Estate Manager and the safety and boilerman as Committee secretary. Quarterly Safety & Health Committee meeting was held. The discussion in the meeting included the following agenda: Passing of previous minutes

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Clause	Indicators	Comply Yes/No	Findings
	between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance		and arising matters, Hospital Assistant Report (Monthly Accident statistics), Mill/Estate Health & Safety Inspection Report and Training & Safety related activities. It can be confirmed that the safety meetings were done on 3-monthly basis.
	4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance	YES	Dara Lam Soon Estate and POM had adhered to Lam Soon SOP internal established procedure. Name of the Emergency Response Team (ERT) members and their contact numbers were displayed at the notice boards of respective sites as well as communicated to all workers. Telephone numbers of the Police Station, Fire Brigade, Immigration Department and Hospital were also included. The ERT comprised of trained First Aiders, Field Staffs, Mandores, Office Staff, and Workshop Operator and Security personnel. The Field Staff and Mandores are responsible for handling emergency at the field. During field inspection, it was noted that all operating units had been provided with first aid boxes which were checked on a monthly basis by the Medical Assistants. Records of replenishment were verified by the auditor
	4.7.6 All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	One clinic with qualified HA is provide for basic medical care. The clinic available for all workers and staffs of Dara Lam Soon Estate and the POM. Serious cases were sent to the Muadzam Hospital which is about 15 km from Lam Soon. All employees were covered by accident insurance. Local workers are covered by SOCSO while for foreign works covered by insurance as required the Workmen Compensation Act 1952. Records were viewed accordingly.
	4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	<u>POM</u> JKKP 8 submit to DOSH department on 27/01/2017. To reported a safety performance for year 2016. There was no accident has been recorded for year 2017. Lost Time Incident (LTI)) as per to date 2017 total work without accident was 199200. Only 1 case accident occur in year 2016 without losing working day. <u>Estates</u> Lost Time Incident (LTI) as per December 2017 work without accident was 748800. 5 cases have been recorded. Sighted record of JKKP 7 submitted to DOSH department within the time frame.

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Clause	Indicators		Comply Yes/No	Findings
				JKKP 8 also been submitted on 13/08/2017 to DOSH department.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programme which cover all aspects of RSPO P&C was available for year 2017. It was established based on training needs identification. Regular assessments of the effectiveness training continued conducted by the CU management.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Records of training conducted were available and maintained accordingly.

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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 impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	NO	Environmental Impact Assessment, Management Action Plans and continuous Improvement Plans (July 2017 to July 2022) dated in June 2017 were reviewed during the audit. However, it has been noted that Environment impact assessment (EIA) was not clearly identified and evaluated for activities in Dara Lam Soon Estate and Mill. Thus, Major NCR RAR02 has been raised.												
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons. Minor Compliance	YES	<div>Significant environmental aspect and impact was derived from the environmental impact Assessment & pollution prevention plan (2017). Those activities evaluated as significant were monitored using the mitigation measure established for each significant activity. Among of activities or process to mitigate the negative impacts to action plan to positive impacts were:</div> <table><tr><th>Process</th><th>Environmental impact</th><th>Action plan</th><th>Person in charge</th></tr><tr><td>Diesel storage</td><td>Hazardous effects of spillage into watercourse and from storage tank at time of filling</td><td>-To bund storage tank (110%) and raising up the platform -Avoid purchase second grade diesel that contain high sulphur. -maintain and monitor effectively usage of diesel by genset and transport to reduce gas emission. -to continuous regular service</td><td>-Executive, storekeeper</td></tr><tr><td>Water management</td><td>-inadequate water supply will affect the cleanliness and hygiene of the linesite. -excess chlorine exposure will pose health hazard and toxic to aquatic animal</td><td>-stream water for domestic use has to be properly treated which comply with the Malaysia National Water Quality Standard. -the rates of chlorine used for water treatment have to be monitored.</td><td>Executive/lab supervisor</td></tr></table>	Process	Environmental impact	Action plan	Person in charge	Diesel storage	Hazardous effects of spillage into watercourse and from storage tank at time of filling	-To bund storage tank (110%) and raising up the platform -Avoid purchase second grade diesel that contain high sulphur. -maintain and monitor effectively usage of diesel by genset and transport to reduce gas emission. -to continuous regular service	-Executive, storekeeper	Water management	-inadequate water supply will affect the cleanliness and hygiene of the linesite. -excess chlorine exposure will pose health hazard and toxic to aquatic animal	-stream water for domestic use has to be properly treated which comply with the Malaysia National Water Quality Standard. -the rates of chlorine used for water treatment have to be monitored.	Executive/lab supervisor
	Process	Environmental impact	Action plan	Person in charge												
	Diesel storage	Hazardous effects of spillage into watercourse and from storage tank at time of filling	-To bund storage tank (110%) and raising up the platform -Avoid purchase second grade diesel that contain high sulphur. -maintain and monitor effectively usage of diesel by genset and transport to reduce gas emission. -to continuous regular service	-Executive, storekeeper												
Water management	-inadequate water supply will affect the cleanliness and hygiene of the linesite. -excess chlorine exposure will pose health hazard and toxic to aquatic animal	-stream water for domestic use has to be properly treated which comply with the Malaysia National Water Quality Standard. -the rates of chlorine used for water treatment have to be monitored.	Executive/lab supervisor													
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum	YES	No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.													

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Clause	Indicators	Comply Yes/No	Findings
	every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance		
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	5.2.1 Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). Major Compliance	NO	HCV Assessment Report was available at the estate and the assessment was conducted in collaboration with the Forestry Department and Wildlife Department Pahang. However, The HCV Assessment report was not comprehensive and did not include the result from Wildlife Department and Forestry Department. Thus, NCR MZK 02 2018 was raised.
	5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	Noted that there were reports from wildlife department and relevant RTE had been included in the HCV action plan. Among measures identified included the erection of signage of "No Hunting" and awareness training. Refresher training on HCV including RTE was also conducted in July 2017, together with Muadzam Shah Wildlife Department. The training was attended by the executive, staffs and workers. Picture, training material and attendance retained. Generally, it can be concluded that the measures concerning RTE, had been implemented.
	5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate	YES	Annual training programme was established, which included refresher training on HCV / RTE. The refresher training was conducted in July 2017, which was attended by the executives, staffs and workers. Picture, training material and attendance retained. The training included the information on disciplinary measures for those who violated the company rules. The new Plan for 2018 was available and it has been noted that the company plans to conduct another refresher training next year i.e. scheduled on March 2018 and August 2018.

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Clause	Indicators	Comply Yes/No	Findings
	disciplinary measures shall be instituted in acc. with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance		
	5.2.4 Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	The CU continued to monitor the HCV area as stated in the action plan i.e. the "HCV Areas Monitoring Check list". Records and forms reviewed during the audit and the monthly monitoring was carried out accordingly. The latest checking was done in Dec 2017. It was also noted that signage pertaining to the identification and restriction of activities at buffer zone and left-over steep areas maintained and no activities inside the areas were evident.
	5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There was no HCV area set-asides for local communities. Based on consultation with the relevant stakeholders, they had stated that they did not depending on the HCV surrounding Estate for their food and needs.
C 5.3 Waste is reduced, recycled, re-	5.3.1 All waste products and sources of pollution shall be identified and documented.	YES	Dara Lam Soon POM had identified all of its wastes and sources of pollution in the Identification, prevention, mitigation and improvement plan on waste / pollution sources. Among the wastes identified for recycling include plastic (from household, inner-layer of fertiliser bags), paper (from office & household) and metal (from workshop & household). These wastes were sent to recycling centre near to the workshop. Scheduled wastes include

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Clause		Indicators	Comply Yes/No	Findings
used, and disposed of in an environmentally and socially responsible manner.		Major Compliance		used lubricant, used oil filter, contaminated rags and gloves, chemical containers and clinical waste. Other domestic wastes such as organic wastes were collected and buried at the estate's landfill. The following were also identified: Air – from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), biogas emission from anaerobic processes (ETP, EFB dumping), Water – cleaning water/run-off/process station waters (hydrocyclone / steriliser condensate / clarification waste) & boiler quenching water and blowdown.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	Yes	Among the identified wastes include empty chemical/pesticides containers. These empty containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	YES	The audited sites maintained their documented SOP for wastes disposal and Waste Management Plan 2017 for ensuring proper waste management and reduce environmental pollution.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	Dara Lam Soon POM had established a fossil fuel action plan. The POM had planned to stop the diesel generator during processing hour, and to ensure the higher load machineries running only during mill operation and also monitor the consumption of diesel per MT/FFB. For the estate, a Fossil Fuel reduction plan for year 2017 which included the following were sighted: <ul style="list-style-type: none"> • monitor the effective usage for diesel by genset and transport. Changing from generator to TNB to supply electricity. • Maintain and monitored diesel usage of vehicles effectively to reduce greenhouse emission • To continue regular servicing of transport for smooth running of engines and prevent leachate.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	Lam Soon had an "Environmental Policy" dated in June 2016. The policy was signed by the Plantation Director. The policy included a statement which does not allow or practices open burning to be conducted at its owned estate. Lam Soon Estate had practices zero burning during replanting.

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Clause	Indicators		Comply Yes/No	Findings					
guidelines or other regional best practice	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	At Dara Lam Soon Estate 95% of palms were mature and only 5% immature palms. There was no evidence that the estate had used fire during replanting.					
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	Dara Lam Soon had assess the environmental aspects and its associated environmental impacts for all its activities related to field operation as well as other facilities such as the workshop, chemical and waste stores The assessment covers activities related to estate operation such as chemical spraying, manuring, harvesting/pruning, EFB mulching, transportation and decanter cake application, chemical storage, etc. For the mill, the assessment covers activities from receiving FFB until dispatch of CPO. Some of the assessment were: Plantations: use of agrochemical, use of diesel/petrol/lubricant, use of fertiliser and electricity consumption. Mill: chemical usage, diesel/lubricant usage, electrical usage, CPO transportation and management of effluent. Lam Soon Estate had included the assessment for activities which emit GHG, e.g. FFB transportation, manuring and road maintenance. For the mill activities included treatment of effluent and operation of diesel engine					
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Dara Lam Soon had established a plan to monitor GHG. The estate had planned to reduce GHG from tractor and for Lam Soon POM, close monitoring of diesel usage. Biogas plant will be commission on March 2018.					
	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	Dara Lam Soon CU had used RSPO PalmGHG Calculator version 3.0.1 as a tool. Sighted report send to RSPO on 5/5/2017. The final emissions value per product are as below: Option 1: <table><tr><td>Description</td><td>tCO₂e/tProduct</td></tr><tr><td>CPO</td><td>0.65</td></tr><tr><td>PK</td><td>0.65</td></tr></table>	Description	tCO ₂ e/tProduct	CPO	0.65	PK
Description	tCO ₂ e/tProduct								
CPO	0.65								
PK	0.65								

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Clause	Indicators		Comply Yes/No	Findings					
emissions. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.				Extraction	%				
				OER	20.97				
				KER	5.62				
				Land Use			Ha		
				OP Planted Area			4,109		
				OP Planted on Peat			0		
				Conservation (forested)			0		
				Conservation (non-forested)			0		
				Total			4,109		
				Production			t/yr		
				FFB Processed			113,863.48		
				CPO Processed			23,882.71		
				Summary of Plantation/field emissions and sink					
				Description			Own		
							tCO2e	tCO2e/ha	tCO2e/tFFB
				Land conversion			13,527.69	9.88	0
				CO2 emission from fertiliser			154.83	0.11	0
				N2O emission			1,068.57	0.41	0
				Fuel consumption			220.90	0.16	0
				Peat Oxidation			0	0	0
Crop sequestration		-12,822.45	-9.36	-0.11					
Sequestration in conservation area		0							
Total		2,149.54	1.2	0.01					

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Clause	Indicators		Comply Yes/No	Findings		
				Summary of Mill emission and credits		
				Description	tCO2	tCO2e/tFFB
				POME	22,319.17	0.2
				Fuel Consumption	304.41	0
				Grid Electricity Utilisation	228.98	0
				Export of Excess Electricity to Housing & Grid	-27.73	0
				Sale of PKS	-5427.69	-0.05
				Sale of EFB	0	0
				Total	17,397.15	0.15
				Palm Oil Mill Effluent (POME) Treatment		
				Diverted to compost	0 %	
				Diverted to anaerobic digestion	100 %	
				POME Diverted to Anaerobic Digestion		
				Diverted to anaerobic pond	100 %	
				Diverted to methane capture (flaring)	0 %	
				Diverted to methane capture (electricity generation)	0 %	

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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 that have social impacts, including replanting, 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 continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	NO	Dara Lam Soon had conducted Social Impact Assessment as verified, titled 'Social Impact Assessment & Management Action Plans and Continuous Improvement Plans' dated in Dec 2106. The SIA report comprises individual reports for Dara Lam Soon Palm Oil Mill and Dara Lam Soon Estate. However, it was found that the Social Impact Assessment records were not complete as it did not include the records of meetings with stakeholders. Therefore, Major NCR MZK 03 2018 was raised.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	NO	The meeting with internal and external has been done, however there is no evidence that the assessment has contained the issue raised from the meetings. Therefore, Major NCR MZK 04 2018 was raised.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. Major Compliance	NO	Social action plan titled 'Social Impact Assessment and Management Action Plan' showing a summary of the issues raised, solutions, person responsible, target date and date of completion was made available at respective sites. The action plan was developed in consultation with the affected parties during the meetings. Some of the Meeting sighted were: <ul style="list-style-type: none"> - Meeting with Orang Asli in Dec 2017 where some of the issues were food provided to Orang Asli community was stale due to early preparation, and some of Orang Asli community did not follow safety and health in the estate. - Meeting with Amesu (Staff Union) in Nov 2017. Some of the issue highlighted were water supply, transport late to school, and school and transport allowance. All issue has been solved with Staff Union. - Meeting with NUPW (Workers Union) in Nov 2017, no issue. - Meeting with workers representative Oct 2017. Some issue highlighted were too many stray dogs at workers line site, and garbage issue need to be addressed. - Stakeholder Meeting was conducted in March 2017. The meetings were attended by the Mill and estate management, Supplier, Government Agencies, Staff, Neighbouring village and contractor's representatives and workers' representatives. All issues discussed were highlighted in the action plan. Having said this, it was found that the SIA Plan failed to identify: <ul style="list-style-type: none"> - Old linesite located in front of the Estate Main entrance that was with no status of ownership, even though the Mill is using it as Staff Quarters. - Boundary marking that was passing through to the villagers' land. There were no official comments from JKKK Kota Perdana to the management. However, it is important for the management to look into this matter. - Stakeholder requested to open the gate at post Padang and Pintu 10 in 24 hours.

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Clause	Indicators		Comply Yes/No	Findings
				However, no explanation or further information fed back to the Villagers regarding this matter. Therefore, Major NCR MZK 05 2018 was raised during this audit.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties Minor Compliance	YES	Since this is the first time that Dara Lam Soon has carried out an SIA, none of the action plan is due for revision and update.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). Minor Compliance	YES	There were no smallholder schemes in the Dara Lam Soon certification unit.
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	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	The estate and mill have a Stakeholders Requests and Responses Procedure, Grievances Procedures and Stakeholders Consultations Procedure, a flowchart for complaints to management from external and internal stakeholders including whistleblower. These documents were all documented and sighted. There was also another set of Books/forms entitled 'Buku Aduan (Complaint Book)' which contain complaints and suggestions from external stakeholders and submitted to the estate during a stakeholder meeting.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The Chairman Internal RSPO Committee of Dara Lam Soon via a letter dated in May 2017 had appointed the Senior Assistant Manager for handling the social issues for the whole Dara Lam Soon.
	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	List of stakeholders that relevant to the company's operation such as neighbouring oil palm estates, local authorities and NGOs was made available at the visited site. The list was updated in Dec 2017. Dara Lam Soon POM and Dara Lam Soon Estate had conducted stakeholders meetings; in Mar 2017 with NGOs, Government Departments, neighboring estates, contractors, suppliers and sundry shop, and in Oct 2017 with workers representatives. Evidence of the above stakeholder consultations were available in the form of signed attendance list as well as photos taken during the meeting. The minutes of the meeting of the consultation was also maintained. Auditor has tried to interview with representatives from NGO – The Forest Trust through several phone call. However, no pick up from the NGO during the audit.

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Clause	Indicators		Comply Yes/No	Findings
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	Dara Lam Soon estate and mill have created a complaints form/books where complainant can fill up and submit to the office. Review of the records revealed that all the filled forms submitted by their staffs and workers requesting for house repairs. Most of the complaints were resolved within 2 to 7 days, depending on the complexity of the complaints. Sighted The new books has developed, and no complaint has been made since July 2017 at POM, at Estate the book is used for employees to lodge complaint pertaining to their houses and the issues will solved within a weeks. Lam Soon maintained affirms that its dispute system is open to any affected parties including whistle-blower. A flowchart titled 'Grievances Process' was observed maintained available for sighted. Anonymity of complainants and whistle-blowers will not be revealed to third parties. There also stated in the Dara Lam Soon Human Right Policy. So far, there was no evidence that disputes happened at the audited sites.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	Dara Lam Soon CU was developed since 1974. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office and was verified by the auditor. Based on interviews with the neighboring villages and records that were available, it can be concluded that there was no evidence of any land dispute at Dara Lam Soon CU. Both the estate and mill also have a system which indicated the status of the complaints. All complaints were satisfactorily resolved and in timely manner.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	Lam Soon POM and estate have a standard procedure for identifying social related issues called "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures defined details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. There was no evidence sighted at any of the estate and palm oil mill of any dispute on customary rights, boundary disputes, etc.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-	YES	"Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation" detail out the procedures for calculating and distributing compensation in a fair manner. These procedures specify that it would take into account ethnic group, gender differences, etc. A flowchart to the same effect was also sighted. Based on interviews with the neighboring villages and records available, There is no evidence sighted at any of the estate and palm oil mill of any dispute on customary rights, etc.

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Clause	Indicators		Comply Yes/No	Findings
		established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	Based on interviews with the neighboring villages and records available, it can be concluded that there is no evidence sighted at any of the estate and palm oil mill of any dispute on customary rights, boundary disputes, etc.
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	For Dara Lam Soon CU, documentation of pay is in the form of monthly pay slips. Conditions of pay were contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the audit. Each pay slip included the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds), net salary, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed clarifications. Samples of pay slips were also sighted and verified that workers were being paid in accordance with the requirements stipulated under the Minimum Wages Order 2016 and Employment Act 1955.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	Contracts for local and Indonesian workers at Dara Lam Soon POM and Estate were sampled. The terms and conditions of employment were contained in the employment contracts which included the duration of employment, place of work, salary, working hours, medical benefits, accommodation, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, etc). For contracts that were prepared in English, explanation and briefing were given to the workers prior to signing. This was further confirmed by the workers during interviews. The workers employment contracts were sampled and reviewed.

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Clause	Indicators		Comply Yes/No	Findings
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, 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). Minor Compliance	YES	All staff and workers are staying at the same quarters area within Dara Lam Soon Estate. Based on visits conducted, the houses provided were adequate, and in reasonably good conditions and comfortable. Interviews with the workers reveal that they were satisfied with the response to requests for any repair works. Each family was given one house. Single workers share between 5-6 persons per house. All houses were supplied with 24 hours of electricity (from TNB/generator set) and water supply (self-treated). Sundry shops, canteen, Masjid, tokong, temple, clinic and recreational facilities such as football field, volleyball and badminton court are also available. Mill has conducted water analysis for <i>E. coli</i> , total coliform, ammoniacal nitrogen, etc. by appointed third party and the monitoring was last conducted in June 2017. The analysis was based on Schedule of Malaysian Food 1983 (Act 281) & Regulation. The result was within the specification. During the audit, it was also found that Health Assistant has conducted the weekly inspection accordingly.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	There are 2 sundry shops and 1 canteen at the workers quarters in the CU. The contracts were administered by DARA Lam Soon Estate and POM. All the shop owners require to list and submit their price to Dara Lam Soon Estate and POM for review prior signing into new contract and whenever there is price change. Contracts between the parties and price lists were available. However, the estate allows the workers to shop outside the estate, not depend on shop in the Estate. The estate has monitored price at the grocery shop once in six months with latest inspection in Dec 2017.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	Lam Soon has published a policy titled 'The Rights of Freedom of Association of Employee' dated March 2017. The policy is available in Bahasa Malaysia and English. The policy was displayed at the estate's and mill's notice boards.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	The National Union Plantation Workers (NUPW) is the union that represents workers in Dara Lam Soon POM and Estate. Union membership is open to both local and foreign workers. Sighted the minutes of meeting between NUPW members, workers representative and Mill and Estate management in Nov 2017. It was attended by management representatives, NUPW representative and Workers representative, etc. No complaint received during the meeting.

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Clause	Indicators		Comply Yes/No	Findings
bargaining for all such personnel.				
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The list of workers which contains worker's detail, including their dates of birth was reviewed for both the estate and mill. Observations were also made during field visits and during interviews with workers confirmed that no one below 18 is employed in the estate and the mill. Dara Lam Soon maintained not employing or exploiting children as determined in its "Labour Policy".
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	Dara Lam Soon has mentioned on the equal opportunities policy in the Labour Policy. The policy was sighted at sites audited. Among other things, the policy specifies that management would ensure that all parties directly or indirectly involved with the estate/mill would be accorded fair treatment, and that the estate/mill would not be involved in, nor support any oppression based on race, caste, nationality, religion, disability, age, sexual orientation, union membership or political leanings. Interviews conducted with the staff and workers (including foreign contract workers) confirmed that there was no discrimination of any form at the estates and palm oil mill.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	A human rights policy, labour policy, special labour policy and 'Polisi Pekerja Wanita' sighted at estate and mill also state their commitment against unfair and discriminatory practices. The company does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. A functioning grievance mechanism is in place. The NUPW, Workers Representative and Gender Committee also looks into allegation of discrimination if reported. Interviews with local workers, foreign workers and female employees confirm that there is no evidence of any form of discriminatory practices by the Dara Lam Soon estates and oil palm mill.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interviews with workers/staff at all the audited sites, they were appointed to their respective positions based on job availability, their experience and qualification. An interview evaluation form, and medical fitness report were sighted which shows an objective assessment of a candidate during a job interview.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The estate and mill have established a Sexual Harassment Policy. The policy defines what constitutes sexual harassment, and states that it would comply with the relevant laws and increase awareness with regards to sexual harassment. The policy is written in the Bahasa Malaysia and displayed on the notice boards. No evidence or acts that contradict this policy were observed. Lam Soon POM and Lam Soon Estate have briefed all employees during gender committee meeting in Dec 2017.

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Clause	Indicators		Comply Yes/No	Findings
are protected.				Nevertheless, all employees interviewed at the estate and mill confirmed that they understand have not encountered any form of sexual harassment.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The company has established a 'Workplace Harassment Policy' to protect the reproductive rights. Dara Lam Soon POM and Dara Lam Soon Estate had briefed their workers during morning muster on this policy. Based on interview with workers, they were aware of the policy requirements. Generally, based on interviews, the female employees were also aware of their maternity rights, and that the workers were aware that they are to cease any spraying and fertilising works once they get pregnant.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism has been sighted at the estate and the mill titled 'Sexual Harassment Procedure'. It involves a flowchart 'Sexual Harassment Reporting Flowchart' which explains the process of grievance handling for both external and internal parties. At Dara Lam Soon Palm Oil Mill and Dara Lam Soon Estate, the flowchart is exhibited prominently near the entrance to the main estate/mill office.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	The CU maintained to source FFB from its own certified supply base only. Thus, no pricing mechanism for FFB is necessary. Meanwhile any services obtained were based on suppliers' quotation, prior to select and award.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	YES	Dara Lam Soon POM and Dara Lam Soon Estate has documented their pricing mechanisms for FFB and CPO transporters as agreed by both parties. This was verified with the contract agreement and payment invoice to the transporter.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviews were conducted with several contractors/suppliers and based on the interviews conducted, the contractors/suppliers understood the contractual agreements they entered into, including their rights and obligations. They confirmed that there was no fixed supply contract with the mill. The supplier also informed that dealings with the mill had been fair, legal and transparent. Payments were received within one or two months of issuance of invoice.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Interviews were conducted with several contractors/suppliers and it was confirmed that payments were made in a timely manner.
C 6.11 Growers and millers contribute to local Sustainable	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be	YES	The CU continued to contribute to local communities as result of stakeholder consultation and relevant action taken. Among the action were provision of bus school, donation, job to local people (villagers and Orang Asli) and lunch for orang asli workers and their sons during working time.

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Clause	Indicators	Comply Yes/No	Findings
development where appropriate.		demonstrated. Minor Compliance	
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	N/A There was no scheme smallholders FFB supplier involved in Dara Lam Soon CU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES Both the estate and mill had adopted the Human Rights Policy which, among others, respects human rights and will not be complicit in human rights infringement. Interviews with workers and staff also confirmed that they entered into the employment voluntarily and freely. Equally, they are allowed to terminate their employment as per their terms of employment, without any penalty. Foreign workers also confirm that the job they are doing corresponds with what they were told on their home country. There was no evidence of contract substitution. All employees work 8 hours a day and are paid overtime should this number of hours exceeded. Workers who work on rest days are also compensated in accordance with the Labour Ordinance.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES As verified through employment contract, passport, work permit and interviews with foreign workers, they confirmed that the current job were as what they were told at their home country, there was no contract substitution has occurred at the visited area.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES Special labour policy for employment of foreign workers has been addressed in the 'Polisi Khas Pekerja' dated in Feb 2017. The policy stated that foreign employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival program.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES Dara Lam Soon had established a policy to respect human rights dated in Feb 2017. The policy was communicated to all levels of the workforce and operations in Jan 2018. This was confirmed during the interview with some workers. The estate and mill adopt the Human Rights Policy which, among others, respects human rights and will not be complicit in human rights infringement.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES Not Applicable since this CU is in East Malaysia. Dara Lam Soon POM and Dara Lam Soon Estate also have no children inside this area.

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Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

It has been confirmed that the CU has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through checking the www.globalforestwatch.com , GOOGLE Maps, Estate Maps and also through site visit there were no new planting or new development of areas at the CU. Hence, indicators were 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 continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to:		
	a)	Reduction in use of pesticides (Criterion 4.6);	Yes	Generally, the CU is committed to reduce the usage of pesticides by implementing IPM such as the increase in the planting of beneficial plant. Mill wastes such as EFB were used as fertilizer in the field. Other improvement plans to minimize chemical usage were by not practicing blanket spraying and soft vegetation were maintained in the field upkeep such as neproliphis biserata and mucuna bracteata.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	Yes	CU continued to maintain its environmental aspects/impacts register associated with their activities. The environmental aspect identification and environmental impact evaluation covers all activities related to milling operation. The "Pollution Identification Environmental improvement action plan" has been established and is being monitored by the relevant appointed personnel.
	c)	Waste reduction (Criterion 5.3);	Yes	CU continued to practice 3R (reduce, recycle, re-use) on wastes management. Waste Management Plan has been established for 2017.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	Yes	'Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution – is in place and is being reviewed accordingly.
	e)	Social impacts (Criterion 6.1);	Yes	Documented plans to avoid or mitigate the negative impacts and promotion of the positive ones, and monitoring of impacts observed had been established and implemented. Management plans pertaining social impact assessment noted reviewed once a year, with

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Clause	Indicators	Comply Yes/No	Findings
			participation with the affected parties. The documented plans contained time-table and responsibilities for implementation by each operating unit.
	f) Encourage optimising the yield of the supply base Major Compliance	Yes	Dara Lam Soon CU is part of a well-established organisation, and the yield performance has always been the top priority in ensuring long-term economic and financial viability. Generally, various efforts had been done to optimise the yield of the plantation such as maximising crop recovery through improve on accessibility to maximise crop evacuation, optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), the soil fertility were maintained inclusive of timely and proper fertilizer application and planting only high yielding planting material such the clonal material.

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Clause	Indicators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a) As a minimum, all estates and mills shall be certified within five years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	As reported earlier, auditor has also verified through weighbridge ticket and interview with weighbridge clerk confirmed that no third party FFB supplier sent their FFB to Lam Soon POM. The POM only received FFBs from its own supply base which are, Dara Lam Soon Estate (North Estate Div and South Estate Div).
	(b) Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	As explained in 4.5.3 (a), this indicator was not applicable to the CU.

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	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the timebound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	No changes to the timebound plan.
-4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since January 1 st 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	No uncertified management units at this CU, hence no replacement of the primary forest or any HCV area, and no new planting development noted.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	Yes	No uncertified management units at this CU, hence no land conflicts issue.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	No uncertified management units at this CU hence, no land disputes issue.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	No uncertified management units at this CU, hence no legal compliance issue.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	-	

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	<input type="checkbox"/> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by the organization. This would require evidence of the self assessment against each requirement;	Yes	No uncertified management unit at this CU.
	<input type="checkbox"/> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team;	Yes	No uncertified management unit at this CU.
	<input type="checkbox"/> Desktop study e.g. web check on relevant complaints.	Yes	No uncertified management unit at this CU.
	• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements	Yes	No uncertified management unit at this CU.
<p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor noncompliance is stated in the RSPO P&C. For example, if a non-compliance against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;</p>			

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ATTACHMENT 4

VERIFICATION OF NON-CONFORMITIES DURING STAGE 2 ASSESMENT AT DARA LAM SOON CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
3.1.1	MAJOR MAR 01 2018	Business Management Plan was not documented and not comprehensive <u>Objective evidence</u> A business or management plan did not documented for minimum three years and the present business management plan did not elaborate to include other expenditure details.	Corrective Action: Dara Lam Soon CU have provide management plan for both mill and estates.	Copy of management plan was provided for three (3) consecutive years i.e. 2018, 2019 and 2020. It was covering all processing for both mill and estates. Status : Closed
4.1.1	MAJOR MAR 02 2018	Standard Operating Procedure (SOPs)/manual were not available and documented at Dara Lam Soon Palm Oil Mill. <u>Objective evidence</u> There were no evidence of SOP/manual for all Operation i.e. work station were at Dara Lam Soon Palm Oil Mill	Corrective Action: DLS POM has formulated a detail of SOP in the mill and mill carried out SOP training during the year. The SOP subject to a yearly review.	Copy of Standard Operating Procedures involving all operational matters were provided by management of DLS POM. Status : Closed
4.3.3	MINOR MAR 03 2018	Road maintenance program was not available <u>Objective evidence</u> There were patches of road need attention for operation i.e. FFB evacuation at field 01A	Corrective Action: Road maintenance will carry out in Feb / Mar 2018 when the weather is conducive.	DLS have provided copy of road maintenance program. Corrective action plan accepted. Status : The effectiveness of the corrective action will be verify during next audit
4.5.2	MINOR MAR 04 2018	Training of those involved in IPM implementation cannot be demonstrated.	Corrective Action: Training will be carry out before implementing the IPM and will be recorded accordingly with photos attached	Copy of training attendance were provided. Corrective action plan accepted. Status : The effectiveness of the corrective action will be verify during next audit
2.2.2	MINOR MZK 01 2018	There was no evidence of physical markers located	Corrective Action: Extra Physical Markers have already been	Corrective action plan accepted

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		and visibly maintained along the legal boundaries Objective evidence: There were no physical markers such as peg located along the legal boundaries between DARA Lam Soon Estate with Kampung Terubin and Some Kampung Orang Asli.	erected along the legal boundaries at a closer distance and easily visible as per attached photos.	Status: Open The effectiveness of the corrective action will be verify during next audit
5.2.1	MAJOR MZK 02 2018	HCV Assessment was not comprehensive. Objective evidence: The HCV Assessment report was not complete to included the result from Wildlife Department and Forestry Department Assessment.	Corrective Action: Will make HCV report more comprehensive when receive Reports from forestry department	Auditor has received new HCV assessment which include assessment report from Perhilitan and Forestry Department. Status: Closed The effectiveness of the corrective action will be verify during next audit
6.1.1	MAJOR MZK 03 2018	Social Impact assessment was not comprehensive Objective evidence: Social Impact Assessment was not complete to include records of meetings with stakeholders.	Corrective Action: Stakeholder comment and input already include in the SIA Report. Estate Management will monitor and solve the issue accordingly.	Auditor has verify new SIA and verify. Estate management already include all the input from Stakeholder. Status: Closed The effectiveness of the corrective action will be verify during next audit
6.1.2	MAJOR MZK 04 2018	SIA was not done with the participation of affected parties Objective evidence: All the meetings with Internal and External Stakeholder has been Done, however the comment and impact was not included in the Assessment.	Corrective Action: Dara Lam Soon Management already extract all the comment into the Social Impact Assessment, and the Estate Management will monitor and solve the issue accordingly.	Auditor has verify new SIA and verify. Estate management already include all the input from Stakeholder. Status: Closed The effectiveness of the corrective action will be verify during next audit
6.1.3	MAJOR MZK 05 2018	SIA Plans was not comprehensive to include all the comments from stakeholder Objective evidence: SIA Plan failed to identify: - Old Linesite in front of gate was no status of ownership, even though Mill use it as a Staff Quarters - Boundary marking was passing through to Villagers Land. No official comment from JKKK Kota Perdana to	Corrective Action: Management already had meeting with JKKP Kota Perdana on 24/01/2018 regarding issue status old linesite in front of gate, boundary and gate at post Padang and Pintu 10. Minutes of meeting as per attachment and we have explained the issue. 1. The records about the status of ownership was not available since change of Dara Lam	Auditor has verified the evidence that consultation with stakeholder affected has been done on 24/1/18 and auditor also sighted evidence the land Surveyor has been appointed with letter dated 25/1/18 Status: Closed The effectiveness of the

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		management, But management should look into this matter. - Stakeholder request to open gate 24 hours at post Padang and Pintu 10, However no explanation to the Villagers regarding this matter.	Soon partnership. 2. The land status and engaged a licence survey out to do a proper boundary marked.	corrective action will be verify during next audit
2.1.1	MAJOR MZK 06 2018 & MAJOR RAR 03 2018	<p>1-#NCR No : MZK 06 2018 - Dara Lam Soon POM <i>Jadual Pematuhan</i>, License No.: 004151. EFB Dumping Area was not proper.</p> <p>Objective evidence: Leachate from the EFB stock yard was found to be flowing into the monsoon drain.</p> <p>2-#NCR No : RAR 03 2018</p> <p>Finding: <u>Dara Lam Soon POM</u> •Certain recommendation of made in CHRA 2015 was not implemented. •Retest for hearing impairment was not conducted and reported to DOSH department. <u>Dara Lam Soon Estate</u> •Noise boundary monitoring at gen set was not carried out at line site Bandar 12 •Requirement made by Jabatan BOMBA for skid tank was not implement</p> <p>Objective evidence: <u>Dara Lam Soon POM</u> •Chemical Exposure Monitoring (CEM) was not conducted as per recommend made by assessor. •Audiometric test was carried out on 04/05/2017. The report was indicated that 9 persons were identified with hearing impairment. <u>Dara Lam Soon estate</u> •Location of gen set was near to the house and will be impact to the residency •Skid tank bund was not properly design at Bandar 12.</p>	<p>Corrective Action: 1- MZK 06 2018 The Mill has undertaken contingency steps to construct perimeter drains over the said area to direct leachate (if any) back to the effluent treatment ponds.</p> <p>2- RAR 03 2018 <u>Dara Lam Soon POM</u> Chemical exposure monitoring and boundary noise monitoring have been obtained from certified hygiene technician (ENV Consultancy & Monitoring Services Sdn Bhd to monitored hearing impact and to do a corrective action based from recommendation.</p> <p><u>Dara Lam Soon Estate</u> Audiometric test was organized by POM on 24/01/2018. Construct the additional bund immediately(110% extra from diesel storage tank))</p>	<p>-Auditor has verify evidence letter quotation to appoint contractor construct the drain which channel into effluent pond at EFB Dumping area dated 1/2/18.</p> <p>- auditor has found a awarded tender to ENV Consultancy & Monitoring Services Sdn Bhd to conducted Chemical monitored and hearing impairment were send to same assessor to monitored their healthiness, -audiometric test and noise boundary will conduct same as POM on 24/01/2018 by same assessor. Sighted picture skid tank have been repair and installed as per requirement from Jabatan BOMBA. Status: Closed The effectiveness of the corrective action will be verify during next audit</p>

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4.7.2	MAJOR RAR 01 2018	At Dara Lam Soon Estate <ul style="list-style-type: none"> Hazard working at orchard areas was not being identified 5 accidents occurred in year 2017 was not reviewed by the OSH committee. 	Corrective Action: OSH committee was discussed and conducted assessment related to hazard to all operation included in orchard activities. Identification of HIRARC will be implemented and following accordingly.	Auditor has verified the evidence that consultation with OSH committee has been revised and included the new activity in HIRARC such "memebaja kebun, mengangkat buah di kebun, etc" with letter dated 01/02/2018. Status: Closed The effectiveness of the corrective action will be verify during next audit
5.1.1	MAJOR RAR 02 2018	Environment impact aspect (EIA) was not clearly identified, predicting, and evaluating for activities in Dara Lam Soon Estate and Mill.	Corrective Action: The management will discuss and elaborate further to monitored and analyzed from all activities in the CU for monitored environment impact will occurs from milling and plantation activities.	Auditor Verification: Auditor has verified the evidence that assessment has been carried out by officer at both operation to analysed and evaluate environment impact from all their activities. Status: Closed The effectiveness of the corrective action will be verify during next audit
4.4.1	MINOR RAR 04 2018	At Dara Lam Soon POM action taken as per water management plan were not carried out. Sighted treatment water analysis by external laboratory has a negative results (acidic).	Corrective Action: Jar test has been carried out at 3 point office, club house. And employees quarters. From assessments it was found that only employees' quarters were acidic results. It was found the source of contaminated was overhead water tank. Mill personal was sent to clean the water tank on 02/02/2018. Additional water test will conducted by third parties on March 2018.	Corrective action plan accepted. Status : OPEN The effectiveness of the corrective action will be verify during next audit

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

RSPO Supply Chain at the Dara Lam Soon palm oil mill – Identity Preserved Model – Module D

Item No	Requirement NOV 2014	Findings Standard Nov 2014																					
D.1 D.1.1	<p>Defination</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p> <p>To verify :</p> <p>a) the volume of certified FFB entering the mill</p> <p>b) the volume sales of RSPO certified</p> <p>The claim only the volume of oil palm products produced from processing of the certified FFB as IP</p>	<p>Dara Lam Soon POM processed FFB only from its own estate. Based on the observations of the current facilities of the mill, the auditor of the opinion that the mill will able to adopt the Identity Preserved Supply Chain Model. The FFB volume entering the mill and sales of RSPO products will not be verified as this is main assessment and no transactions was made.</p>																					
D 2 D.2.1	<p>Explanation</p> <p>Estimate total tonnage of CPO and PK potentially produce in a year</p>	<p>Projection (Jan 2018 – Dec 2018)</p> <table> <tr> <td></td><td></td><td>MT</td></tr> <tr> <td>(1) FFB Received</td><td></td><td>110,645.00</td></tr> <tr> <td>RSPO</td><td>110,645.00</td><td></td></tr> <tr> <td>(2) FFB Processed</td><td></td><td>110,645.00</td></tr> <tr> <td>RSPO</td><td>110,645.00</td><td></td></tr> <tr> <td>(3) CPO Production</td><td>24,342.00</td><td></td></tr> <tr> <td>(4) PK Production</td><td>5,532.00</td><td></td></tr> </table>			MT	(1) FFB Received		110,645.00	RSPO	110,645.00		(2) FFB Processed		110,645.00	RSPO	110,645.00		(3) CPO Production	24,342.00		(4) PK Production	5,532.00	
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D. 2 D 2.2	<p>Explanation</p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim.</p>	<p>There was no palmTrace yet as this is the first main assessment.</p>																					

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D 3 D 3.1	Documented procedures The site 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; b) The role 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 site's procedures for the implementation of this standard.	a) Dara Lam Soon CU has established procedure title: SOP on RSPO Supply Chain describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. b) The Manager and Assistant Manager have the overall responsibility and authority over the implementation of the supply chain requirements. Interviewed with relevant person in-charge at critical control point was revealed they are understood on the RSPO standard requirements which requires no mixing of RSPO certified and non RSPO certified material in receiving, processing, storage and delivery.
D 3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	As stated in the procedure SOP on RSPO Supply Chain Receiving of certified and non-certified FFB procedure is stated in section 4. Reception. It was confirmed that no outsider crop (non-Certified) was received by Lam Soon POM.
D.4 D.4.1	Purchasing and goods in The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	All certified FFB came from own supply base/estates namely Dara Lam Soon Estate (North and South Division). All delivery documents of certified FFB shall be accompanied with Despatch Chits. Despatch Chits state with information such as Name of Estate from which FFB originates, Date of Despatch, Transporter and Serial No. The Mill Weighbridge shall verify the source and issue the weighbridge ticket. The clerk shall keep the DC copy and maintain in the file. The Person in charge (Assistant Manager) were verified to ensure the certified status of the FFB. Volumes of certified FFBs received by the mill had been properly recorded and monitored.
D 4.2	The site shall inform the CB immediately if there is a projected overproduction.	Not applicable as this is the first Main Assessment
D.5 D.5.1	Record keeping The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	Dara Lam Soon POM has maintained the monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record entitle " <i>Identity Preserved Records for Oil Mills</i> ". It records on the 3 Monthly basis.
D 6 D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	The mill only receives certified crops from it own estates, for dispatching of CSPO and CSPK, following procedures are taken to ensure the product are original from their own estates. See 5. PROCESSING & STORAGE g) <i>Mixing of certified and non-certified FFB is strictly forbidden. All certified FFB must be kept and handled separately from reception at the ramp, throughout processing, handling and Storage of CSPO & CSPK.</i>
D.6.2	The objective is for 100 % segregated material to be reached.	Lam Soon POM does not accept any non-certified FFB. It was confirmed through weighbridge summary report therefore CPO and PK can be considered 100% segregated.