



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

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	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 : 26 February – 1 March 2019

DURATION : 12 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 1

Recertification Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 (REVISED 14 JUNE 2017)

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

VALIDITY OF RSPO CERTIFICATE : 18/5/2018-17/5/2023

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 : Mohd Zulfakar Kamaruzaman

Name : JEROME LAI EIM NYEAN

Signature :

Signature :

Date : 4/6/2019

Date :
Manager / Engineer

4 JUNE 2019

RSPO P&C PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit			
On-site audit date :	16-18 January 2018	No. of auditor days :	12
Audit team :	Rozaimée Bin Ab Rahman, Mohd Zulfakar Kamaruzaman, Mohd Raouf 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
	√		√
	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 :	26 February – 1 March 2019	No. of auditor days :	12 Auditor days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Amir Bahari		
No. of major NCR :	6	Indicator : 4.7.3, 5.3.2, 6.5.2, 6.2.1 , 5.13.1 (SCCS), D 4.2 (SCCS)	Closing date : 30/05/2019
No. of minor NCR :	Nil	Indicator : -	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities
	√		√
	Contract workers	NGOs	Govt. agency
	√		√
	Indigenous people	Contractor	Others (Please specify)
	√	√	
Supply base sampled :	Dara Lam Soon Estate		
Changes since the last audit :	Nil		
Justification of audit planning :	Total allocation of auditor days for Dara Lam Soon CU were: <ul style="list-style-type: none"> • Mill = 6 days (6 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • Estate = 6 days for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by :	Radziah Mohd Daud	Approval date : 4/06/2019	

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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	:				
Justification of audit planning					
Report approved by	:		Approval date :		

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	Villagers	Suppliers
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
Supply base sampled	:				
Changes since the last audit	:				
Justification of audit planning					
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	Villagers	Suppliers
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractors	Others (Please specify)	
Supply base sampled	:				
Changes since the last audit	:				
Justification of audit planning					
Justification of audit planning					
Report approved by	:		Approval date :		

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2/ RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Jan 2018- Dec 2018	March 2019- Feb 2020			
Certified FFB Processed (MT)	110,645	116,090			
Production of Certified CPO (MT)	24,342	24,960			
Production of Certified PK (MT)	5,532	6,385			
Certified Areas (Ha)	4,220	4,220			
Planted Areas (Ha)	4,109	4,109			
Production Areas (Ha)	4,096	4,109			
HCV Areas / Conservation Areas (Ha)	11	11			
REMARKS					

TABLE 2

	PO	PK
Last years certified volume (MT)	24,342.00	*5,907.47
Last years actual certified sold (MT)	8,432.72	2,231.65
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	13,172.75	3,675.82
New year certified volume (MT)	24,960.00	6,385.00

*Refer to the PK extension volume of 375.47 MT, approved on 29/5/2019

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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
Mohd Zulfakar Kamaruzaman	Lead Auditor Land Title, Social, HCV & Supply Chain	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Rozaimée Ab. Rahman	Auditor Environment and occupational health and safety & Time Bound Plan	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.
Amir B Bahari	Auditor GAP, Health & Safety related to plantation	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 30 years in the oil palm industry including in the mill and estates. A qualified RSPO P & C Auditor with experience in ISO, EMS and RSPO/MSPO auditing.

1.3 Audit methodology

The scope of the audit was based on a sampling of the supply bases. However, according to the new RSPO Certification system 2017 if the unit have 4 or below supply base, all estate should be audited. For this CU, Dara Lam Soon palm oil mill is with one supply base only; the Dara Lam Soon Estate. The audit has included visit to the estate, 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

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 8 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

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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: Actual FFB production by the supply base for the last reporting period (Jan 2018- Dec 2018)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Dara Lam Soon Sdn Bhd	102,551.17	100	SIRIM QAS
Total	102,551.17	100	

Table 2: Projected FFB production by supply base for the next reporting period (Mar 2019- Feb 2020)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Dara Lam Soon Estate	116,090	100	SIRIM QAS
Total	116,090	100	

Table 3: Actual FFB received and CPO & PK dispatch by Dara Lam Soon POM for the last reporting period

(Jan 2018- Dec 2018)

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	102,551.17
FFB Processed	102,551.17
CPO Production	21,605.47
CPO delivered as RSPO	8,432.72
CPO delivered as non-RSPO	13,172.75
CPO delivered under other sustainable schemes	-
PK Production	5,907.47
PK delivered as RSPO	2,231.65
PK delivered as non-RSPO	3,675.82
PK delivered under other sustainable schemes	-

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Table 4: Projected FFB received and CPO & PK dispatch by Dara Lam Soon POM of the next reporting period (Mar 2019- Feb 2020)

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	116,090
FFB Processed	116,090
CPO Production	24,960
CPO delivered as RSPO	24,960
CPO delivered as non-RSPO	-
CPO delivered under other sustainable schemes	-
PK Production	6,385
PK delivered as RSPO	6,385
PK delivered as non-RSPO	-
PK delivered under other sustainable schemes	-

Table 5 Planted and certified area of Dara Lam Soon CU

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

Table 6: Planting profile for Dara Lam Soon CU

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1997	2 nd	Mature	19	0.46
1999	2 nd	Mature	221	5.38
2000	2 nd	Mature	5	0.12
2001	2 nd	Mature	463	11.27
2002	2 nd	Mature	525	12.78
2003	2 nd	Mature	198	4.82
2004	2 nd	Mature	709	17.25
2005	2 nd	Mature	788	19.18
2006	2 nd	Mature	9	0.22
2007	2 nd	Mature	555	13.51
2009	2 nd	Mature	604	14.70
2015	2 nd	Mature	13	0.32
Total			4109	100

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Jerome Lai Gim Nyea / 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	:	dlspom2013@gmail.com / yapfabian@gmail.com

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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 since last assessment.

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 Not applicable.
There is no associated smallholders supplying FFB to the CU.

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.)

3.4 Status of previous non-conformities * Closed Not closed*

* If not closed, minor non-conformity will be upgraded to major non conformity

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 : Nil

Total no. of major NCR(s)
(details refer to Attachment 4) List : 4 4.7.3, 5.3.2, 6.5.2, 6.2.1

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

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

Total no. of major NCR(s) (details refer to Attachment 5) List : 2 5.13.1, D 4.2

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.

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.

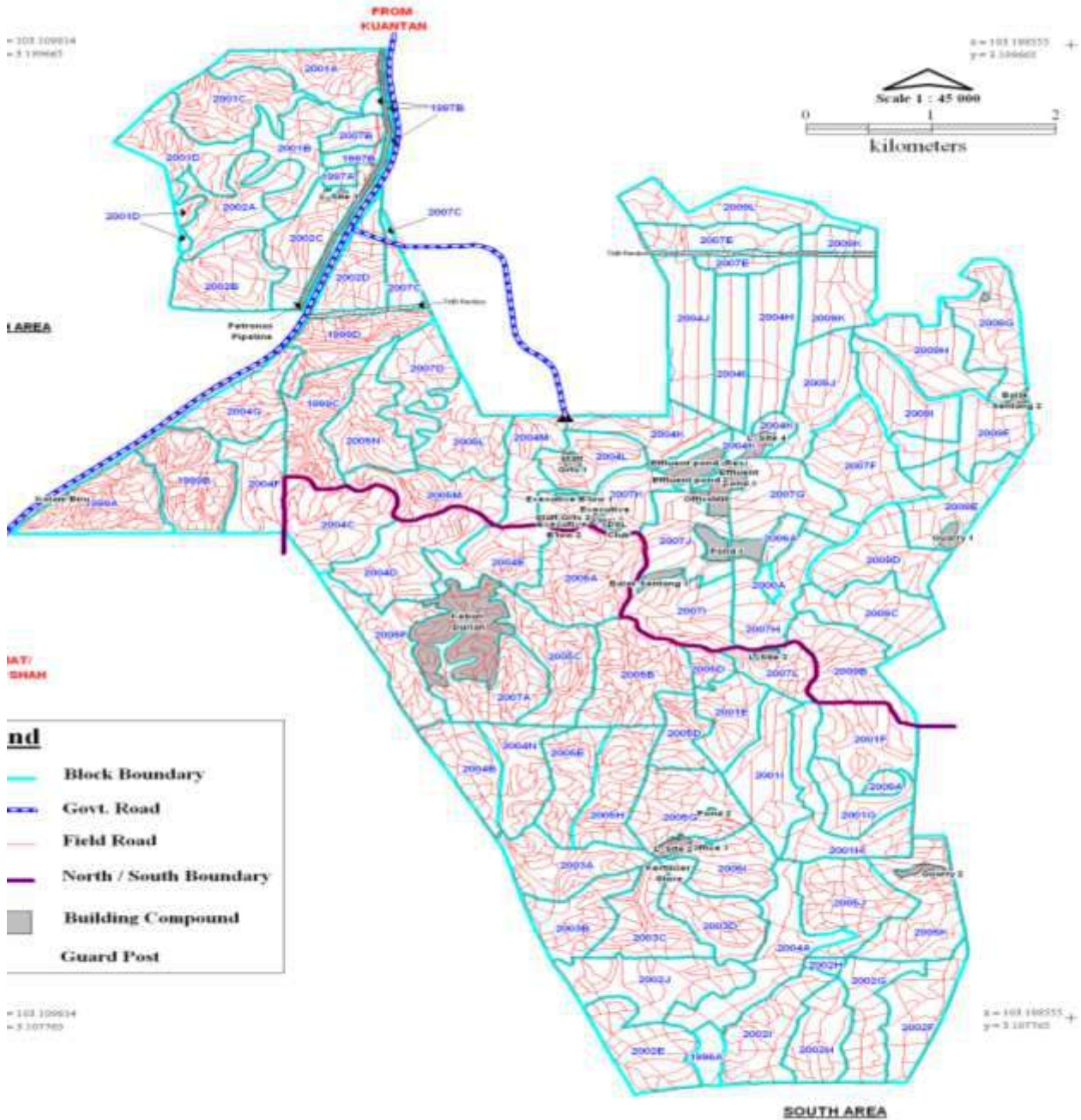
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

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 :	MOHD ZULFAKAR KAMARUZAMAN		30/5/19
	_____	_____	_____
	(Name)	(Signature)	(Date)

Map of Dara Lam Soon CU



note:
 *to be construed as 'Legal Description'
 used with reasonable care for reference but accuracy is not guaranteed
 liable for any inaccuracies herein contained. It is noted that AAR has
 major or lesser that might arise from the use or misuse of this map and
 are contained.

AAR 29/03 2018
 Last GPS Mapping 08 2009 Am
 Last Update 11 2017 3Basic_18 Unit

RSPO Surveillance Audit Plan

1. Objectives

The objectives of the audit are as follows:

- (i) To evaluate the Certification Unit 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 : 26th February – 1st March 2019

3. Site of assessment : Dara Lam Soon CU

- Dara Lam Soon POM
- Dara Lam Soon Estate

4. Reference Standard:

- a. RSPO P&C MYNI:2014
- b. RSPO Certifications Systems for P&C, June 2017
- c. RSPO Supply Chain Standard, 2017
- d. Company's audit criteria including Company's Manual / Procedures

5. Assessment Team

- a) Lead Auditor : MOHD ZULFAKAR KAMARUZAMAN (HCV, Land Title, SC)
- b) Auditors : ROZAIMEE AB RAHMAN (Environmental, Safety & Health, TBP)
: AMIR BAHARI (GAP, Safety)

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

7. Audit Method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit, immediate suspension of RSPO certification shall be recommended.

For minor non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non conformities if the corrective actions are not satisfactory implemented in the next audit.

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

11. Reporting

- a) Language : English
- b) Format : Verbal and written
- c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

12. Facilities Required

- a. Room for discussion
- b. Relevant document and record
- c. Personnel protective equipment if required
- d. Photocopy facilities
- e. A guide for each group

13. Assessment Programme Details : As below

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Day 1: 26/02/2019 (Tuesday)

Time	Activities / areas to be visited			Auditee
8.00am – 8.30am	Opening Meeting at Dara Lam Soon POM – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			
8.30am – 9.20am	Organization representative to brief on the following: 1) RSPO implementation at Dara Lam Soon CU (i.e. mill & supply base) including changes 2) Time bound plan for Lam Soon Cannery Private Limited 3) Significant changes on organization activities, machinery, supply bases capacity etc. 4) Verification of last assessment findings			Management Representative
9.20am – 10.00am	To assign each audit team members – site and the P&C requirements			
10.00am – 1.00pm	Zulfakar POM Coverage of assessment: P1, P2, P4, P5, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Responsible consideration of employees and of individuals and communities affected by growers and millers • Employment conditions • Consultation and communication • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders • Check pay slip, Contract Agreement • Check Sundry Shop • Land titles user rights • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement • Interview with FFB supplies and other supplies • Interviews with estate workers, safety committee and contractors • Growers and millers respect human rights. 	Amir POM Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Interview with FFB supplies and other supplies • Interviews with Mill workers • Facilities at workplace • Interview with workers, safety committee and contractors • Training and skill development programmes. • Continuous improvement • Good Milling Practice- witness activities at site • Commitment to long-term economic and financial viability. 	Rozaimée POM Coverage of assessment: P1, P2, P4, P5, P7, P8 <ul style="list-style-type: none"> • Implementation, training and safe use of agro-chemicals. • Continuous improvement • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors. • Training and skill development programmes. • Laws and regulations • witness activities at site (lab/ boiler, WTP, etc) • Environmental management – witness activities at site • Chemical store • implementation, training and safe use of chemicals. • To verified time bound plan and partial certification systems. • Verified GHG data and information 	Guide(s) for each auditor

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1.00pm – 2.00pm	LUNCH BREAK	
2.00pm – 5.00pm	Continue assessment:	
17.00.- 18.00	Audit team discussion / End of Day 1 audit	All

Day 2: 27/02/2019 (Wednesday)

Time	Activities / areas to be visited			Auditee
	Zulfakar	Rozaimée	Amir	
8.30am – 1.00pm	<p><u>POM</u></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Responsible consideration of employees and of individuals and communities affected by growers and millers • Employment conditions • Consultation and communication • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders • Check pay slip, Contract Agreement • Check Sundry Shop • Land titles user rights • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement • Interview with FFB supplies and other supplies (if Any) • Interviews with estate workers, safety committee and contractors • Growers and millers respect human rights 	<p><u>POM</u></p> <p>Coverage of assessment: P1, P2, P4, P5, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Witness activities at site (weeding/ spraying, etc) • Interview with workers and contractors • Environmental management – witness activities at site • Waste & chemical management • Chemical store/fertilizer • implementation, training and safe use of agro-chemicals. • Continuous improvement • Interview with workers, environment and Safety committee and contractors. • Training and skill development programmes. • Occupational safety & health practice – witness activities at site • Verified GHG data and information 	<p><u>Estate</u></p> <p>Ccoverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Interview with FFB supplies and other supplies • 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 • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc • EFB mulching, POME application. • Commitment to long-term economic and financial viability. • Plantation on hilly/swampy area • New planting 	Guide(s) for each auditor
1.00pm – 2.00pm	LUNCH BREAK			

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2.00pm – 5.00pm	Continue assessment	Guide(s) for each assessor.
17.00.- 18.00	Audit team discussion / End of Day 2 audit	All

Day 3: 28/02/2019 (Thursday)

Time	Activities / areas to be visited			Auditee
8.30am – 1.00pm	Zulfakar	Zaimiee	Amir	Guide(s) for each auditor
	Estate	Estate	Estate	
	Coverage of assessment: P1, P2, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Responsible consideration of employees and of individuals and communities affected by growers and millers • Employment conditions • Consultation and communication • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders • Check pay slip, Contract Agreement • Check Sundry Shop • Land titles user rights • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement • Interview with FFB supplies and other supplies (if Any) • Interviews with estate workers, safety committee and contractors • Growers and millers respect human rights 	Coverage of assessment: P1, P2, P4, P5, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Witness activities at site (weeding/ spraying, etc) • Interview with workers and contractors • Environmental management – witness activities at site • Waste & chemical management • Chemical store/fertilizer • implementation, training and safe use of agro-chemicals. • Continuous improvement • Interview with workers, environment and Safety committee and contractors. • Training and skill development programmes. • Occupational safety & health practice – witness activities at site • Verified GHG data and information 	Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Interview with FFB supplies and other supplies • 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 • Good Agricultural Practice-witness activities at site (weeding/ spraying, etc • EFB mulching, POME application. • Commitment to long-term economic and financial viability. • Plantation on hilly/swampy area • New planting 	
1.00pm – 2.00pm	LUNCH BREAK			
2.00pm – 5.00pm	Continue assessment			Guide(s) for each assessor.
17.00.- 18.00	Audit team discussion / End of Day 2 audit			All

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Day 4: 1/03/2019 (Friday)

Time	Activities / areas to be visited			Auditee
8.30am – 1.00pm	<p style="text-align: center;">Zulfakar</p> <p style="text-align: center;"><u>Estate</u></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Responsible consideration of employees and of individuals and communities affected by growers and millers • Employment conditions • Consultation and communication • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders • Check pay slip, Contract Agreement • Check Sundry Shop • Land titles user rights • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement • Interview with FFB supplies and other supplies (if Any) • Interviews with estate workers, safety committee and contractors • Growers and millers respect human rights 	<p style="text-align: center;">Rozaimée</p> <p style="text-align: center;"><u>Estate</u></p> <p>Coverage of assessment: P1, P2, P4, P5, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Witness activities at site (weeding/ spraying, etc) • Interview with workers and contractors • Environmental management – witness activities at site • Waste & chemical management • Chemical store/fertilizer • implementation, training and safe use of agro-chemicals. • Continuous improvement • Interview with workers, environment and Safety committee and contractors. • Training and skill development programmes. • Occupational safety & health practice – witness activities at site • Verified GHG data and information 	<p style="text-align: center;">Amir</p> <p style="text-align: center;"><u>Estate</u></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Interview with FFB supplies and other supplies • 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 • Good Agricultural Practice-witness activities at site (weeding/ spraying, etc • EFB mulching, POME application. • Commitment to long-term economic and financial viability. • Plantation on hilly/swampy area • New planting 	<p>Guide(s) for each auditor</p>
1.00pm – 2.00pm	LUNCH BREAK			
2.00pm – 3.30pm	Continue assessment on unfinished area			Guide(s) for each assessor.
3.30pm – 4.00 pm	<ul style="list-style-type: none"> • Verification on outstanding issues • Audit Team discussion, preparation on audit findings and issuance of NCR (if any) 			
4.00pm – 5.00pm	Closing Meeting			All

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: Environmental Policy, Social Policy, Occupational Safety & Health Policy and Ethical Business Conduct.
	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 was recorded in 'Buku aduan'. From the review of these records, it was noted that the communication was mainly on request for repairs of the employee's houses. 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 environmental or social outcomes.	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	The Occupational Health & Safety Plan titled ' <i>Occupational Safety & Health Plan 2019</i> ' has been established. Indicators set in the plan are being monitored. The implementation of OSH plan was monitored by internal audits conducted by OSH executives and Sustainability Unit.
		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 the CU notice board.
		Pollution prevention and reduction plans	YES	The list of waste generated from estate and mill activities were made available. All sources of pollution were identified by the management. Pollution prevention and reduction plans with the mitigation measure and action taken was also made available.
		Details of complaints & grievances	YES	No complaint or grievances were observed.
		Negotiation procedures	YES	Negotiation procedure maintained available.
		Continual improvement plans (Criterion 8.1);	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

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Clause	Indicators		Comply Yes/No	Findings
				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 was publicly available at SIRIM QAS website.
		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 in the 'HR Policies and Procedures Code of Conduct' effective date in Apr 2012. The CU continued communicated the policy to their staffs including foreign workers during the induction course and training.

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 and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	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. The following were reviewed i.e. Registry of companies, MPOB license, DOE license, Suruhanjaya Tenaga, Permit to purchase and storage of diesel from KPDNKK and Permit to storage liquid gas. Factory and Machinery Act 1967 – i) Person In Charge Regulation 1970 ii) Steam Boiler and Unfired Pressure Vessel 1970 iii) The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2) CF iv) Noise Exposure Regulations 1989 2) EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 •Final discharge method – water discharge (currently channel to biogas plant) •Analysis of the final discharge was carried out on monthly basis. Quarterly report was submitted to DOE, within approved limit. 3) As per the requirement of section 49A EQA 1974 amendment 2014 the requirements for 4) competent person Scheduled Waste Regulations 2005 i) Regulation 3 (Notification of scheduled waste generated) ii) Regulation 9 (Storage of scheduled waste < 180 days) 5) OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000 i) Regulation 27 (health surveillance programme)

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Clause	Indicators		Comply Yes/No	Findings
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. The estates and mill maintained had the respective Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective Managers. The Sustainability Unit are responsible to track changes and the information was disseminated to all its plantations and Mill 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 were implemented. The mechanism were by Evaluation of compliance exercise against the legal register by Sustainability Executive and the internal audit.
	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.
C 2.2 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.	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance	YES	After the review of the document provided, it has been verified that the land titles were previously owned by Teras Dara Konsortium. The land has been sold to Dara Lam Soon Sdn Bhd (aka Dara Lam Soon CU) in 1975. The Land title also specified that the purpose of the planting is either for oil palm or agricultural crops for economic value. It can be confirmed that Dara Lam Soon CU maintained and complied with the terms of the land title.
	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	In the field verification at Dara Lam Soon Estate, it has been observed that the boundary stones were visibly maintained between the estate with the neighboring private oil palm plantations such as Bebar Estate (Boustead) Neighboring village (Kota Perdana) and Govt Road. However, there was no physical markers available along the legal boundaries between Lam Soon Estate and Kampung Terubin and some Kampung Orang Asli. Thus, 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 & evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Dara Lam Soon CU since 1975. The audit team had confirmed that there were no land issues related to previous owners.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Dara Lam Soon CU since 1975. Hence, there was no land conflict anticipated and no need for acceptable conflict resolution processes.

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Clause	Indicators		Comply Yes/No	Findings
	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. Minor Compliance	YES	As reported in 2.2.1, it has been verified that there was no conflict or dispute over the land.
	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	As reported in 2.2.1 of this checklist, it has been verified that the land is owned by Dara Lam Soon CU since 1975. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict is required.
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. Major Compliance	YES	As reported in 2.2.1 of this checklist, Dara Lam Soon CU has been developed since 1975. All the related documentation regarding the land acquisition was kept in Dara Lam Soon HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Hence, there was no map showing the legal, customary, or user right of other users since 1975.
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include: 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 decision was taken; 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	YES	As reported in 2.2.1 of this checklist, Dara Lam Soon CU has been developed since 1975. All the related documentation regarding the land acquisition was kept in Dara Lam Soon HQ Office and was verified by the auditor. The documentation sighted during the audit showed that there were no issues regarding the land with villagers, local community and neighboring estate since 1975. The audit team had also confirmed this through interviews of relevant stakeholders and based on the audit findings, copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	the company's title, concession or lease on the land. Minor Compliance		
	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	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Dara Lam Soon CU.
	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	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Dara Lam Soon CU.

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

Clause	Indicators	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1 A business or management plan (min 3 years) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	The business plan and budget were available and kept in soft copy. The documents were categorised as confidential. Information in the documents were sighted and briefed by the Estates/Mill Managers. Generally, the estates business plan was towards sustainable business and prepared in a 3-5 year horizon.
	3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance	YES	The estates had no replanting program for the forthcoming 5 years. The nearest year is in 2025 for the South Estate.

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

Clause	Indicators	Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately	4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	Yes	The Mill adopted the documented procedures; Standard Operating Procedures (StOps) for the day-to-day operations. Similarly the estates in DLS CU adopted the following manuals and documents as their standard operating procedures: Oil Palm Agricultural Policy dated May 2016 and Safety Operating Procedure.

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Clause	Indicators		Comply Yes/No	Findings
documented, consistently implemented and monitored.	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	Yes	The mechanisms to check the implementation of procedures were carried out through internal audit, safety and health meeting and daily field inspection, workplace inspection by Managers, Senior Assistant/Assistant Managers, and field staff.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	Yes	The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and checked. Among others the records are; Daily production/work records for the activities at the estates, field cost book/chemical consumption record, mature field work program, fertilizer application/herbicide spraying, rat baiting/harvesting and collection of FFB, FFB cages/ramp crop balances, FFA/OER,KER and Throughput, Plantation Director Visit, Internal Audit Head Office Finance etc.
	4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). Major Compliance	YES	With regards to the information provided by Dara Lam Soon CU, the auditor has verified through the weighbridge ticket and interview with weighbridge clerk, and it was confirmed that Dara Lam Soon POM did not receive any third party FFB.
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained SOPs are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	The CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the Oil Palm Agricultural Policy Section No 3.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	The fertilizer records were available in store issue notes and manuring record book, costing which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Evidence of periodic tissue foliar analysis to monitor the changes in nutrient status was available and presented in the report dated in Sept 2018. The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programs. The soil sampling nutrient status was shown in the report dated Feb 2017.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	EFB application was done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from DLS POM.
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	Based on the soil map, there was no peat soil or soil categorized as problematic or fragile at the CU.
	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	All the estates implemented prevention of soil erosion measures such as construction of road side drains along the road sides and also in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with <i>Neprolepis biserrata</i> . Most slopes had well established <i>Mucuna bracteata</i> .
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	Road maintenance program for FY 2019 was available for both the estates and recorded.
	4.3.4	Subsidence of peat soils shall be	YES	There were no peat soils or soil categorized as problematic or fragile soil at DLS

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Clause	Indicators	Comply Yes/No	Findings
	minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance		North and South estates.
	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	There were no peat soils or soil categorized as problematic or fragile soil at DLS North and South estates.
	4.3.6 A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	There were no peat soils or soil categorized as problematic or fragile soil at DLS North and South estates.
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	YES	Both the estates and the mill had established the Water Management Plan with latest updates in Jan 2019. The PIC and the dateline with status had been shown in the PLAN. Water samples from the catchment are taken on 6 monthly basis and analyzed by 3 rd party.
	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	The estates continued to protect the watercourses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates maintained the buffer zone by restricting agrochemicals application. Water courses and wetlands were protected including maintaining and restoring appropriate riparian buffer zones. There was no natural gazetted rivers/stream flowing within the CU complex. The signboards were displayed and sighted at the catchment area. During the field visit there was no spraying activities or signs observed in such an area.
	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	ETP was available at DLPOM to treat the POME. According to DOE's license, the disposal method of the final discharge was through water irrigation. The ETP was 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 and the performances were in compliance with the stipulated requirement.
	4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance	YES	The 2018 water consumption for the mill processing has been recorded and calculated against the FFB processed. The Water/FFB was between 1.23 and 2.10. Variation factors attributed to weather condition, mill cleaning schedule and general activities.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM techniques.	4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	The CU continued to implement IPM in the estates. It continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Policy Manual.
	4.5.2 Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Trainings relating to IPM implementation were organized mainly at estate level by the executives. This includes beneficial plant and rat baiting management. Training records evident.
C 4.6	4.6.1 Justification of all pesticides used shall be	YES	All pesticides used were those officially registered under the Pesticide Act 1974. All

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Clause	Indicators	Comply Yes/No	Findings
Pesticides are used in ways that do not endanger health or the environment.	demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance		chemicals purchases are made through approval by the Head Office. No illegal agrochemicals (stated by local and international laws) paraquat was used in the estates.
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance	YES	The estates in the CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. 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. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974.
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	The CU was committed to minimize the usage of agrochemicals through the implementation of IPM practices among others; The planting of beneficial plants, no prophylactic use of such pesticides was permitted and installation of BOB at ratio of 10-20ha: 1box.
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance	YES	All the estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.
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	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates.

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Clause	Indicators	Comply Yes/No	Findings
	understood by workers. Major Compliance		
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 all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	The quantity of agrochemicals required for various field conditions are documented and justified in DLS Agricultural Policy Manual and SOP. The implementation in the field is consistent with the Agriculture Reference Manual <i>Paraquat</i> usage has been ceased in the CU and in the entirety of the organization.
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 application of agrochemicals was not practiced in DLS CU.
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	Training on pesticide/chemical handling was continuously carried out in DLS CU. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. From interviews with the staff and workers such as the storekeepers and sprayers it was evident that they have been trained and understood the hazards involved and how the chemicals should be used in a safe manner. Records of training evident.
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	Proper disposal noted and in compliance with that required by law.
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	Specific medical surveillance as recommended by the CHRA were evident.
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by DLS in 2017 whereby no work with pesticides was given to pregnant or breast-feeding women.
C 4.7 An occupational	4.7.1 An occupational health and safety policy shall be in place. An occupational health	YES	For Dara Lam Soon POM & Estates, Occupational Safety and Health Policy was available at the sites. The policy was available in English and Bahasa Malaysia and

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Clause	Indicators		Comply Yes/No	Findings
<p>health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:</p>		<p>and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance</p>		<p>were communicated to all employees through briefings by the OSH representatives. The Occupational Safety & Health Plan 2019 was updated on January 2019. 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.</p>
	4.7.2	<p>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</p>	YES	<p>At Dara Lam Soon POM, the HIRARC was last updated in Dec 2018. 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.</p>
	4.7.3	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). 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</p>	NO	<p>PPEs issuance and replacement records were available in File "penerimaan PPE". Records of training for each employee were maintained at the office for reference and verification, and were verified during the audit. 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. However, During a field visit at N05M to witness spraying activities has revealed that;</p> <ul style="list-style-type: none"> a) 1 sprayer was not wearing the long rubber boots provided by the management posing risk of spillage onto the feet. b) 1 sprayer had used a self-made filter for the single cartridge respirator mask not adhering to the approved unit and material. <p>The workers were unable to explain the importance of the correct PPE to be used. Thus, a Major NCR AB 01 2019 is raised.</p>
	4.7.4	<p>The responsible person/persons shall be identified. There shall be records of regular meetings 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</p>	YES	<p>Lam Soon Estate has established their Safety and Health Committee organization chart. The committee was chaired by the Estate Manager. Among the agenda discussed in the meeting include: Passing of previous minutes and arising matters. Medical Assistant Report (Monthly Accident statistics), Estate Inspection Report & Estate activity. The meetings were carried out on quarterly basis.</p>
	4.7.5	<p>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</p>	YES	<p>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</p>

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Clause	Indicators		Comply Yes/No	Findings
		operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance		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	Lam Soon Estate provides medical care to all estate workers using clinics at Lam Soon Estate established within the premises and more serious cases are referred to Hospital Muadzam which is about 20 km away. Lam Soon CU had continued to provide a group insurance for all workers as required under the Workmen Compensation Act 1992.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	<u>Lam Soon POM</u> Accident statistics are being maintained and periodically reviewed during the quarterly 'Health and Safety' committee meeting. Minutes of meeting were reviewed. 7 accidents has been recorded for year 2018 without lost manday more than 5 days. <u>Lam Soon Estate</u> JKKP 8 form was submitted to DOSH in Jan 2019 with 4 accidents recorded for year 2018. Sighted an evidence reported to DOSH (JKKP 6) immediately after the accidents occurs. Auditor also verified all accidents has been investigated by OSH committee to find root cause of incident.
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 program for 2019 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Dara Lam Soon POM and estate. Training Plan was established in Jan 2019. Training needs identification matrix has been established with target dates for the training to be conducted.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Dara Lam Soon Estate & POM CU had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Verified records for trainings done.

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	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	Dara Lam Soon CU has established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact (EAI) covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the palm oil mill effluent (POME) and land contamination related to the management of scheduled wastes and domestic

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Clause	Indicators		Comply Yes/No	Findings
<p>impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>				<p>waste. For the estate operation, all activities from harvesting, manuring, weeding, nursery, pest and disease, upkeep program until delivery to mill were identified.</p>
	5.1.2	<p>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</p>	YES	<p>Environmental Impact Assessment (EIA) Plan, updated by the Sustainability Officer. The plan included the person(s) in charge and mitigating actions. A time table for monitoring has been established and monitored accordingly.</p>
	5.1.3	<p>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 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</p>	YES	<p>At Dara Lam Soon CU, mitigation measures were defined in the Waste Management Plan. The plan is to ensure proper control of the wastes in the estates to prevent pollution. The programme covers the activities, sources of pollution, effect to environment, prevention, and mitigation. The programme also indicated the proposed start and completion date, budget and person in-charge as well as the status/verification. The following indexes were being monitored: Fuel and lubricant leakage discharged to the land, Chemical spillage discharged to the land, Dust pollution, Air pollution from vehicle, Felling of palms, fertilizer & agro chemical usage.</p>
<p>C 5.2 The status of rare, threatened or endangered species other HCV 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.</p>	5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). Major Compliance</p>	YES	<p>The report HCV was conducted internally with collaboration with Wildlife Department and Forestry Department in Sept 2017 and the report was completed in May 2018. The study had covered all the HCV / Biodiversity within and adjacent to the 1 estates under Dara Lam Soon CU. The HCV assessment had identified no HCV/Biodiversity found directly within the boundaries of any of the sites of Dara Lam Soon CU as the CU was surrounded by other oil palm plantations. However, the management decide to maintain the Buffer Zone as their conservation Area.</p>
	5.2.2	<p>Where 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</p>	YES	<p>The HCV Assessment report indicated that there was no RTE species, or HCVs, were present by plantation or mill operations.</p>
	5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, appropriate disciplinary measures shall be instituted in accordance 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</p>	YES	<p>Although there was no RTE species found in the CU, Dara Lam Soon still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately.</p>

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Clause	Indicators	Comply Yes/No	Findings
	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	An action plan for year 2019 was made available at the Dara Lam Soon Estate. The outcomes of monitoring were included in the HCV report. The outcomes of monitoring were included in the HCV report. Dara Lam Soon Estate has conducted two Monthly monitoring of their Buffer zone and Boundary. No RTE species were found within the estates area.
	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	It has been verified that there was no HCV area set-asides for local communities. It was confirmed that the stakeholders did not depending on the HCV surrounding Estate for their food and needs.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner.	5.3.1 All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Dara Lam Soon CU has documented identification of all waste product and sources of pollution. The Pollution Prevention plans were then established to mitigate applicable identified waste product and source of pollution.
	5.3.2 All chemicals and their containers shall be disposed of responsibly. Major Compliance	NO	At Dara Lam Soon Estate disposal of waste material related to pesticide containers are being carried out as per established procedures. Triple rinsing activities continually implemented for empty pesticide container. Triple rinsed container were then pierced and stored prior disposing and disposed using approved DOE contractor. However, during site visit at Schedule waste store, sighted there was no labelling of waste (N-Hexane) and storage of waste items was not properly (located on the floor and near the monsoon drain). Thus, #Major RAR 01 2019 has been raised.
	5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	YES	For the identified waste and pollutants, there were procedures and guideline established as to guide the waste disposal activities and to reduce pollution on the routine operation. The Pollution Prevention plans were then established to mitigate applicable identified waste product and source of pollution the plans was established. Industrial @ mill process wastes had been disposed as follows; EFB were sent for mulching in the field, while crop residue/biomass i.e. fiber and shell were used as fuel in the boiler. For Estates, Chemical container and lubricant oil was disposed using scheduled waste. On the monitoring of water and effluent discharge, monthly and quarterly report for final discharge were submitted in timely manner as stipulated in the written approval. Effluent quality monitoring was also done on the monthly basis. Sample taken at final discharge point was sent for analysis. On the scheduled waste management, the established procedures - Handling of Scheduled Waste. Scheduled wastes were disposed through DOE's licensed contractor.
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	<u>Dara Lam Soon POM</u> Boiler Fuel Monitoring Plan has been included. Program to reduce Diesel Usage Consumption was in place by monitoring the diesel generator running hours. The Management has constructed the biogas and construction was completed in Nov 2018. The plant had started its operation since then and the mill diesel consumption was reduced in 2018.

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Clause	Indicators		Comply Yes/No	Findings											
				<u>Dara Lam Soon Estate</u> Objective and target for FY2019 was set to reduce consumption of fossil fuel. Various program has been implemented such as minimum utilization of diesel generator set, reduce machineries and vehicles breakdown. Management has taken an action by rip off all the old vehicles and change it to new.											
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	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	There was Replanting Policy adopted by the estate in the DLS CU. Statement among others has expressed the commitment as follows: <i>Palm debris will be stacked and left to rot to recycle the nutrient. No OPEN BURNING will be practiced.</i>											
	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	No open burning.											
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 emissions. Growers and millers commit to an implementation period until the end of	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	An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The environmental aspect and impact (EAI) covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the palm oil mill effluent (POME) and land contamination which were related to the management of scheduled wastes and domestic wastes.											
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	The environmental aspect and impact (EAI) was used to identify the GHG emissions Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Dara Lam Soon CU also plan to reduce GHG by construct Biogas plant to capture Methane gas generated from the Effluent Treatment Plant to generate bio gas engine to produce electricity for mill and domestic use. The Plant has been Complete and now in the trial process.											
	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. The final emissions value per product are as below: Option 1: <table border="1" data-bbox="1128 1281 2056 1422"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Extraction</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.05</td> <td>OER</td> <td>21.07</td> </tr> <tr> <td>PK</td> <td>0.05</td> <td>KER</td> <td>5.76</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Extraction	%	CPO	0.05	OER	21.07	PK	0.05	KER
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<p>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.</p>			<table border="1" data-bbox="1128 300 1603 580"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area</td> <td>4109</td> </tr> <tr> <td>OP Planted on Peat</td> <td>0</td> </tr> <tr> <td>Conservation (forested)</td> <td>0</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>0</td> </tr> <tr> <td>Total</td> <td>4,109</td> </tr> </tbody> </table> <table border="1" data-bbox="1128 603 1603 715"> <thead> <tr> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>FFB Processed</td> <td>102551.17</td> </tr> <tr> <td>CPO Processed</td> <td>21605.47</td> </tr> </tbody> </table> <p data-bbox="1128 762 1576 785">Summary of Plantation/field emissions and sink</p> <table border="1" data-bbox="1128 788 2016 1126"> <thead> <tr> <th rowspan="2">Description</th> <th colspan="3">Own</th> </tr> <tr> <th>tCO2e</th> <th>tCO2e/ha</th> <th>tCO2e/tFFB</th> </tr> </thead> <tbody> <tr> <td>Land conversion</td> <td>13,494.77</td> <td>9.88</td> <td>0.13</td> </tr> <tr> <td>CO2 emission from fertiliser</td> <td>25.12</td> <td>0.02</td> <td>0</td> </tr> <tr> <td>N2O emission</td> <td>688.24</td> <td>0.17</td> <td>0</td> </tr> <tr> <td>Fuel consumption</td> <td>251.01</td> <td>0.18</td> <td>0</td> </tr> <tr> <td>Peat Oxidation</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Crop sequestration</td> <td>-12791.24</td> <td>-9.36</td> <td>-0.12</td> </tr> <tr> <td>Sequestration in conservation area</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>1667.9</td> <td>0.88</td> <td>0.01</td> </tr> </tbody> </table> <p data-bbox="1128 1152 1482 1174">Summary of Mill emission and credits</p> <table border="1" data-bbox="1128 1177 2016 1431"> <thead> <tr> <th>Description</th> <th>tCO2</th> <th>tCO2e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>3792</td> <td>0.04</td> </tr> <tr> <td>Fuel Consumption</td> <td>289.21</td> <td>0</td> </tr> <tr> <td>Grid Electricity Utilisation</td> <td>96.48</td> <td>0</td> </tr> <tr> <td>Export of Excess Electricity to Housing & Grid</td> <td>-82.77</td> <td>0</td> </tr> <tr> <td>Sale of PKS</td> <td>-4335.08</td> <td>-0.04</td> </tr> </tbody> </table>	Land Use	Ha	OP Planted Area	4109	OP Planted on Peat	0	Conservation (forested)	0	Conservation (non-forested)	0	Total	4,109	Production	t/yr	FFB Processed	102551.17	CPO Processed	21605.47	Description	Own			tCO2e	tCO2e/ha	tCO2e/tFFB	Land conversion	13,494.77	9.88	0.13	CO2 emission from fertiliser	25.12	0.02	0	N2O emission	688.24	0.17	0	Fuel consumption	251.01	0.18	0	Peat Oxidation	0	0	0	Crop sequestration	-12791.24	-9.36	-0.12	Sequestration in conservation area	0	0	0	Total	1667.9	0.88	0.01	Description	tCO2	tCO2e/tFFB	POME	3792	0.04	Fuel Consumption	289.21	0	Grid Electricity Utilisation	96.48	0	Export of Excess Electricity to Housing & Grid	-82.77	0	Sale of PKS	-4335.08	-0.04
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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	Yes	A Social Impact Assessment (SIA) covering Dara Lam Soon POM and Dara Lam Soon Estate was carried out by the Social Liaison Officer at Dara Lam Soon CU. The Report was done in Sept 2017 with the participation of internal and external stakeholders, namely workers, union, contractors, suppliers, local community, local government and private entities. Records of meetings with the relevant stakeholders were duly documented and sighted.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	Yes	There was documented evidence in the form of meeting attendances where workers, union, contractors, suppliers, local community, local government and private were present during the stakeholder consultations. Based on the records available, there was evidence that the assessment was done with participation of all affected parties/stakeholders, whose attendance was documented and sighted during the audit. Auditor has read the SIA report and found that all comment from stakeholder has been included in the report.
	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	Yes	Stakeholders meeting were held by the CU to get inputs for reviewing and updating the SIA Management Action Plan 2019. The action plan had documented Action Plan/Issue, Time Bound, Management Review and PIC.

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Clause	Indicators	Comply Yes/No	Findings	
	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	The SIA plan was reviewed on yearly basis and updated as necessary. In some cases where the review had concluded that changes should be made to current practices. The SIA management action plan (external and internal) was reviewed Feb 2019 for Dara Lam Soon CU. The review was conducted with the participation of affected parties such as local communities, Government Agencies, Workers and contractors.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). Minor Compliance	Yes	It has been confirmed that there were no smallholder schemes in Dara Lam Soon certification unit. Hence, the requirement of this indicator did not apply to the CU.
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	NO	The CU has continued to use the internal communication through morning assemblies, notice boards and posters, and complaint forms/book. 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 or at any time during office hour. Flowchart for complaints to management from external and internal stakeholders also available in Grievances process and Grievance procedure. However, it was found that, Some of the complaints/communication/Grievances was not recorded in Complaint book and interview with the Stakeholders (workers/villagers) they don't know how to channel the complaint properly. Thus Major NCR MZK 02 2019 was raised.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	Yes	The Sr. Asst. Manager was the person-in-charge of the consultation and communication with internal and external parties and social issues at DLS Estate since May 2017. As for DLS POM, the PIC was the Mill Asst. Manager.
	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	The stakeholders meeting was conducted in Apr 2018 with contractors, neighboring estates, Government Agencies, and neighboring villagers such as JKKK Kota Perdana, etc. The stakeholders list for the CU has been updated in Jan 2019. Evidence of communications, complaints, grievances, disputes etc. with internal and external stakeholders could be tracks in the stakeholders meeting files which kept by the estate and mill. Files on external communication were kept according to the agencies or parties communicated, for examples, Department of Safety and Health, and Department of Environment, and so forth. And, records of action taken had been highlighted in the SIA Management Action Plan.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and	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	Lam Soon maintained affirms that its dispute system was 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. It can be concluded that the system that open to all affected parties were in place and shall be able to resolves disputes, when there were any.
	6.3.2	Documentation of both the process by	Yes	Based on the records reviewed and stakeholders, it can be confirmed that there was no

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Clause	Indicators		Comply Yes/No	Findings
accepted by all affected parties		which a dispute was resolved and the outcome shall be available. Major Compliance		evidence of any land dispute at Dara Lam Soon CU. As for the complaints and feedback system, the estate and mill had mechanism in place where complaints status were tracked and monitored accordingly. It was verified that all listed complaints were satisfactorily resolved, 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	Dara Lam Soon CU 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. The procedure ensure that 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.
	6.4.2	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-established communities; and differences in ethnic groups’ proof of legal versus communal ownership of land. Minor Compliance	Yes	“Land Dispute Compensation and Calculation Procedure” and “Procedure For Calculating & Distribution Fair Compensation” detailed out the procedures for calculating and distributing compensation in a participatory and 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. Interviews with the relevant stakeholders confirmed that the mechanism for them to express their views are available, and the issues (if any) will be dealt in accordance with this standard requirement. However, the stakeholders have confirmed that there was no existing/known dispute that causing the need for any negotiation resulting in compensation process etc. either in the mill or the estate.
	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	As mentioned in 6.4.2, there were no existing/known issues related to this indicator, hence it was not applied to Dara Lam Soon CU.
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	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	Yes	For Dara Lam Soon CU, documentation of pay was 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.
	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	NO	Contracts for local and Indonesian foreign workers at Dara Lam Soon Estate and Dara Lam Soon Palm Oil Mill were sampled. The terms and conditions of employment are contained in the employment contracts and include 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

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Clause	Indicators	Comply Yes/No	Findings
wages			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 sample of employment contracts were sampled. However, it was found that at Dara Lam Soon CU Workers' employment contracts were not renewed upon expiry. Therefore Major NCR MZK 01 2019 has been raised against this indicator.
	6.5.3	Yes	It can be concluded that 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). All staff and workers are staying at the same 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.
	6.5.4	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 was price change. Contracts between the parties and price lists were available. However, the estate allows the workers to shop outside the estate, not 100% depending on shops available in the Estate.
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 assc. and collective bargaining are restricted under law, the employer facilitates parallel means of ind. and free association and bargaining for all such personnel.	6.6.1	Yes	Lam Soon has published a policy titled 'The Rights of Freedom of Association of Employee'. The policy was available in Bahasa Malaysia and English. The policy was displayed at the estate's and mill's notice boards.
	6.6.2	Yes	The NUPW was the union that represents some of workers in Dara Lam Soon POM and Estate, both local and foreign workers while, AMESU represent the Staff. Sighted the Meeting between Management and AMESU in Nov 2018. It was attended by management representatives, AMESU representative. It was noted that the Representative of NUPW has decided to do the meeting with management in March 2019, as updated in the social plan of Dara Lam Soon Estate.
C 6.7 Children are not employed or exploited.	6.7.1	Yes	Dara Lam Soon has specified in the Labour Policy that they will not employing or exploiting children for labour. 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 confirm that no one below 18 was employed in the estate and the mill. It was evident that the CU only hired workers with age more than

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Clause	Indicators		Comply Yes/No	Findings
<p>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.</p>	6.8.1	<p>A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance</p>	Yes	<p>18 years old. Dara Lam Soon CU has mentioned on the equal opportunities policy in the Opportunity Equality Policy. 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 affiliation. Interviews conducted with the staff and workers (including foreign contract workers) confirm that there was no discrimination of any form at the estates and palm oil mill.</p>
	6.8.2	<p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance</p>	Yes	<p>A human rights policy, Opportunity Equality Policy, labour policy, special labour policy and 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 was in place.</p>
	6.8.3	<p>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</p>	Yes	<p>Dara Lam Soon CU had demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs. 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.</p>
<p>C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.</p>	6.9.1	<p>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</p>	Yes	<p>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 English and Bahasa Malaysia and displayed on the notice boards. No evidence or acts that contradict this policy were observed. Dara Lam Soon CU. The policy had been communicated to all staffs and workers during morning muster and training. All employees interviewed at the estate and mill confirmed that they understand have not encountered any form of sexual harassment.</p>
	6.9.2	<p>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</p>	Yes	<p>The company has established a 'Workplace Harassment Policy' to protect the reproductive rights. The policy had been communicated to all staffs and workers during morning muster and training. 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.</p>
	6.9.3	<p>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</p>	Yes	<p>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.</p>
<p>C 6.10 Growers and millers deal fairly and</p>	6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance</p>	Yes	<p>The CU maintained to source FFB from its own certified supply base only. Thus, no pricing mechanism for FFB was necessary.</p>

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Clause	Indicators	Comply Yes/No	Findings	
transparently with smallholders and other local businesses.	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 (where these are under the control of the mill or plantation). 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 contractors/suppliers. Based on interviews conducted, the contractors/suppliers understood the contractual agreements they entered into, including their rights and obligations. He informed 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 contractors/suppliers. It has been confirmed that payments were made in a timely manner.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	Yes	The CU continued to contribute to local communities as result of stakeholder consultation and relevant action taken. Among the action were provision of school bus, donation and job to local people.
	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	Yes	It was confirmed that 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. All foreign workers interviewed, confirm that there were no contract substitution during their come to Malaysia.
	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', 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. The policy was communicated to all levels of the workforce and operations.

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Clause	Indicators		Comply Yes/No	Findings
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 (see Criteria 1.2 and 2.1). Major Compliance	Yes	Dara Lam Soon had established a policy to respect human rights dated 22/2/2017. The policy was communicated to all levels of the workforce and operations on 18/2/19 (POM), 6/12/18 at Estate. 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. And, furthermore, Dara Lam Soon POM and Dara Lam Soon Estate did not have children in their plantation area.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Dara Lam Soon CU has no plan for any new planting and no new development of area was observed during the visit. Thus Principle 7 was not applicable. Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps, and also through site visit to the Dara Lam Soon estate area. Based on the audit findings, it was confirmed that there were no new planting or new development of areas at Dara Lam Soon CU.

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: Major Compliance		

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	a)	Reduction in use of pesticides(Criterion 4.6);	Yes	<p>The CU adopted the following practices for the reduction of chemicals;</p> <ul style="list-style-type: none"> a) Enhance planting of beneficial plants i.e. <i>Tunera subulata</i>, / <i>Cassia cobanensis</i> / <i>Antigonon leptopus</i> b) <i>Neproliphis biserata</i> maintained and encouraged coverage to suppress growth of noxious weeds and thus reducing utilisation pesticides for selective weeding. c) Woody sprayings were carried out only whenever necessary 2x/year. Blanket spraying was not practiced to promote soft grasses in inter rows and frond stacking area. d) Mills by-products i.e. EFB were used as fertilizer in the field thus reducing dosage of fertilizer application.
	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 (EAI) and environmental impact evaluation (EIE) covers all activities related to milling operation. The "Pollution Identification Environmental improvement action plan" has been established and was 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 2019.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	Yes	The CU continued to establish and implement GHG emission reduction plan. Among the plan implemented were periodical maintenance of tractor and power generator, application of organic material (biomass) as fertiliser.
	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 participation with the affected parties. The documented plans contained time-table and responsibilities for implementation by each operating unit.
	f)	Encourage optimizing the yield of the supply base	Yes	<p>The practices adopted by the estates in optimising the yield in the CU estates are the common practices within the industry. The yield performance has always been the utmost priority in ensuring long-term economic and financial viability. In general, the efforts made such as;</p> <ol style="list-style-type: none"> 1. maximizing crop recovery (complete LF collection) optimum ripeness 2. standard (harvest ripe bunches only and 100% loose fruit collection), 3. the soil fertility was maintained and planting only high yielding planting 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 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	It has been confirmed that Dara Lam Soon CU only received FFBs from its own supply base which is the Dara Lam Soon Estate (North Estate Div and South Estate Div. No new acquisitions were sighted.
	(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 mentioned above, this indicator was not applicable to the CU.
	(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 time-bound 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 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be	YES	There was no uncertified management units at this CU, hence no replacement of the primary forest or any HCV area or no new planting development was sighted.

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	verified by an RSPO accredited CB;		
	(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	There was no uncertified management units at this CU, hence no land conflicts issue arises.
	(c) Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	There was no uncertified management units at this CU hence, no land disputes issue arises.
	(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 arises.
	(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: <ul style="list-style-type: none"> • A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; • Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. • Desktop study e.g. web check on relevant complaints • 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	
4.6.4 The CB shall review whether oil palm	No additional indicators	YES	As mentioned in 2.2.1 of this checklist, it has been verified that the land were previously owned by company; Teras Dara Konsortium. The land was sold to Dara Lam Soon Sdn Bhd (aka Dara Lam Soon CU) in 1975. It has been specified that the Land purpose was for

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<p>operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>			<p>planting, either for oil palm or agricultural crops for economic value. It can be confirmed that Dara Lam Soon CU maintained and complied with the terms of the land title. With this, it can be concluded that the land was neither subjected to any customary rights of local communities nor any indigenous peoples.</p>
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Note:

1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC 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;
2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.7.3 AB 01 2019	Major	<p>Finding: Appropriate PPE was not used /adhered by the sprayers.</p> <p>Objective evidence: Field visit at N05M to witness spraying activities has revealed that;</p> <p>a) 1 sprayer was not wearing the long rubber boots provide by the management posing risk of spillage onto the feet.</p> <p>b) 1 sprayer had use a self-made filter for the single cartridge respirator mask not adhering to the approved unit and material.</p> <p>The workers were unable to explain the importance of the correct PPE to be used.</p>	A Comprehensive trainings on the appropriate use of PPE for sprayers was conducted on 5/3/19 at sprayer room and those responsible will have to check regularly on the sprayers to ensure that they comply accordingly.	<p>Auditor has received and verified evidence of training has been given to spraying workers on 5/3/19.</p> <p>Status: Closed The implementation of corrective action will be verified by next audit.</p>
5.3.2 RAR 01 2019	Major	<p>Finding : Storage and handling of chemicals containers at POM was not appropriate.</p> <p>Objective evidence : During site visit at Dara Lam Soon POM Schedule waste store, sighted there was no labelling and storage of waste items (N-Hexane) was not properly (placed on the floor and near the monsoon drain).</p>	Schedule waste store sump was now covered, drain, and gate bunded and labelled properly as per Schedule waste act.	<p>Auditor has received and verified picture of schedule waste store already bunded and covered the drain and N hexane was labelled properly.</p> <p>Status: Closed The implementation of corrective action will be verified by next audit.</p>
6.5.2 MZK 01 2019	Major	<p>Finding: Workers' employment contracts were not renewed upon expiry.</p> <p>Objective evidence: Sampled workers contracts have expired and not renewed:</p>	<p>Correction: Workers employment contract has been renewed and updated accordingly.</p> <p>Corrective action: In future, the effective date of workers employment contracts is according to the date of workers work permit renewal to avoid overlooked</p>	<p>Auditor has received and verified new contracts of the sampled workers and one of them were already repatriated.:</p> <p>Status: Closed The implementation of corrective action will be verified by next audit</p>
6.2.1 MZK 02 2019	Major	<p>Finding: Consultation and communication procedure was not understand by Stakeholders.</p> <p>Objective evidence: Interviewed with workers and stakeholder found that, Some of the complaints/communication/Grievances was not recorded in Complaint book and interview with the Stakeholders</p>	Corrective Action: A training on the proper consultation and communication procedures was conducted on 7/3/19 during morning muster, they were briefed on how to make	<p>Auditor has received and verified picture, attendance list that training on consultation and communication procedure has been conduct on 7/3/19.</p> <p>Status: Closed</p>

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		(workers/villagers) they don't know how to channel the complaint properly.	a complaint and record it in the complaint book and any other matters that may arise.	The implementation of corrective action will be verified by next audit.
RSPO SCCS 2017 5.13.1 MZK 03 2019	Major	Finding: Management reviews was not conduct at planned intervals Objective evidence: No record on management review was presented during the audit.	Corrective Action: The management review has conducted on 1/3/19 and the minutes meeting has been attached	Auditor has received and verified minutes meeting of management review has been conducted on 1/3/19. Status: Closed The implementation of corrective action will be verified by next audit.
RSPO SCCS 2017 Module D Identity Preserved D.4.2 MZK 04 2019	Major	Finding : There was projected overproduction of certified tonnage. Objective evidence : Sighted that overproduction Projected PK IP for period From Jan 2018 – Dec 2018.	Corrective Action: The application for PalmTrace PK volume extension submitted to SIRIM QAS.	RSPO has approved the PK extension application on 29/5/19. Status: Closed The implementation of corrective action will be verified by next audit.

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Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

SECTION A : GENERAL INFORMATION

1. File Reference No.	: ED04270001
2. Name of facility/ site(s) /entity(ies)	: Lam Soon Cannery Private Limited - Dara Lam Soon POM
3. Site Location (single site/multisite/Group)	: Locked Mail Bag No. 4, No. 4, 26700 Muadzam Shah, Pahang
4. SC model	: Identity Preserved
5. Type of entity	: Palm Oil Mill
6. RSPO Member Number	: 2-0909-18-000-00
7. Annual summary records of certified oil palm products purchased and claimed	: Jan 2018 – Dec 2018 Total FFB processed – 102,551.17mt Total CPO produced – 21,605.47 Total PK produced – 5,907.47 Total CPO sell as IP – 8,432.72 Total CPO sell as Conventional – 13,172.75 Total PK sell as IP – 2,231.65 Total PK sell as Conventional – 3,675.82

SECTION B (i): RSPO SUPPLY CHAIN CERTIFICATION SYSTEM (REVISED JUNE 2017)

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT	
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	N/A as this audit is a surveillance audit.
	Audit Process Requirements – SURVEILLANCE AUDIT	
5.3.26	The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification	The organizational systems, the management systems and the operational systems, including any documented policies and procedures of Dara Lam Soon Palm Oil Mill (hereafter refers as DLSPOM) are sufficient and adequate in complying with latest revision of RSPO Supply Chain Certification Standard. DLSPOM only being certified with RSPO, no other management system implemented on site. SOP Supply Chain was established

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	<p>Standard. In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.</p>	<p>and latest review dated 12/1/19. Mill Assistant Manager has been appointed as the RSPO Supply Chain Management Representative.</p>
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SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the supply chain	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Dara Lam Soon POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable due to Dara Lam Soon POM is processing facility.
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	RSPO Palm Trace details are as followed; Member name: Dara Lam Soon Sdn. Bhd.
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in DLS POM scope of certification
2	Supply chain model	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	DLSPOM had demonstrated the correct use of supply chain model; They continue to apply the IP model and their suppliers are of own supply base namely Dara Lam Soon Estate.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	They decided to maintain the IP model for their supply chain system. Therefore, they are being audited against the general chain of custody requirement for the supply chain as well as Module D of the RSPO Supply Chain Standard.
3	Documented procedures	
3.1	The site shall have written procedures and/or work instructions to	The Supply Chain Procedure was revised in documented procedure title ' <i>RSPO/MSPO</i>

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	ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	<i>Supply Chain'</i> , dated in Jan 2019. The procedure was kept in file RSPO Supply Chain. Appropriate changes were also made in the change.
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	DLSPOM 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. It was found that the documented procedures related to implementation of requirements of RSPO Supply Chain Certification Standard (latest revision) were sufficient. Also refer para D3.2 of this checklist for details.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	DLSPOM only apply RSPO Supply Chain system within their organization. Therefore, records as such purchasing & sales (FFB delivery note, WB advice ticket, FFB grading, Daily FFB received, Delivery notes), production log (CPO & PK production, Daily production report), training, control of non- conformance, complaint etc. were noted to be updated accordingly.
c)	Identification of 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 organization's procedures for the implementation of this standard.	The Mill Assistant Manager has been appointed as the RSPO Management Representative (RSPO MR) having the overall responsibility and authority over the implementation of the supply chain requirements. Based on interview with RSPO MR, it was noted that he understands the standard requirement as well as their internal RSPO Supply Chain system within the organization.
3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii. Effectively implements and maintains the standard requirements within its organization.</p> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.</p>	The Internal Audit Procedure has been developed namely Sustainability Internal Audit Procedure. Internal Audit has been conducted in Feb 2019 by Internal Auditor. No finding Has been raised during Internal Audit. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.
4	Purchasing and goods in	
4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); 	Dara Lam Soon POM has continued received and process certified FFB came from own supply base/estates namely Dara Lam Soon Estate. All delivery documents of certified FFB were verified to ensure the certified status of the FFB. Volumes of certified FFBs received by the mill had been properly recorded and monitored.

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	<ul style="list-style-type: none"> The quantity of the products delivered; Any related transport documentation; Supply Chain certificate number of the seller; A unique identification number. <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	Dara Lam Soon POM had continued received source of RSPO certified FFB from own group estate. Dara Lam Soon POM has continued to implement and comply with the procedure in handling of purchasing and receiving as per RSPO standard requirements.
b)	The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.	Shipping announcement of certified CPO produce were made in the RSPO IT Platform (palm trace).
c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcement	Sighted summary of weighbridge report and confirmed Dara Lam Soon POM had continued received source of RSPO certified FFB from own group estate.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	DLSPOM has not recorded non-conforming material and/or documents since last audit. Mechanism of handling the conformity (if any) was clearly indicated in their SOP on RSPO Supply Chain.
5	Outsourcing activities	
5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.</p> <p><i>This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).</i></p>	DLSPOM has defined transportation as their outsourced activity. They have assigned 2 transporters to carry their CPO to designated destination. For PK the Refinery has sent their own transporter.
5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	DLSPOM has sufficiently indicated the relevant standard requirement pertaining to outsource activity to their hired transporters.

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	<p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	No contractor involved in the processing of CPO and PK.
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.	As of todote, no contractors used for processing or production of the RSPO certified materials.
6	Sales and goods out	
6.1	<p>The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number. 	CPO & PK Delivery records were viewed and in compliance with the requirement of the standard.

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7	Registration of transactions	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are supply chain actors between the mill and final refinery; take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and are part of the supply chain of RSPO Certified Sustainable oil palm products <p>must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.</p>	<p>The registration of transaction being carried out by the Group Plantation Sustainability Officer, using the RSPO Member ID. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</p>
8	Training	
8.1	<p>The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.</p>	<p>Training plan has included the RSPO Supply chain training scheduled in March 2019 for staff & workers.</p>
8.2	<p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed.</p>	<p>Training has been conducted for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system in Jan 2019 attended by SCCS PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.</p>
9	Record keeping	
9.1	<p>The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p>	<p>All relevant document and records were sighted and found that DLS POM maintained accurate, complete, up to date, and accessible records and reports covering all aspects of these RSPO SCCS Standard requirements. Among the record sighted incoming FFB weighbridge ticket, delivery note, mill production report, outgoing CPO and PK, dispatch note, contract order.</p>
9.2	<p>Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>All records related to RSPO SC were maintain minimum for 2 years. Sample CPO dispatch note since Jan 2015 until to date was available and well maintained.</p>
9.3	<p>The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.</p>	<p>The estimate volume of FFB, CPO and PK were verified and record were maintained for 12 months period.</p>
10	Conversion factors	

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5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org).	The amount of CPO and PK has been determined using Oil Extraction Ratio (OER) and Kernel Extraction Ratio (KER).
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Both conversion rates, the OER and KER has been based on the actual performance of the mill.
11	Claims	
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork. DLSPOM has not use any RSPO trademark.
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	DLSPOM has not receive any complaint from stakeholder. Should there be any, they refer to Grievances Process procedure & Stakeholder Requests & Responses.
13	Management review	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted twice a year
13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement 	There was no record of Management review conducted. Therefore, Major NCR MZK 03 2019 had been issued to address the matter.
13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and 	There was no record of Management review has been conducted. Therefore, Major NCR MZK 03 2019 had been issued to address the matter.

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	its processes • Resource needs	
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RSPO Supply Chain at the palm oil mill - Module D – CPO Mill: Identity Preserved

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) The Supply Chain Procedure was revised in documented procedure title ' <i>RSPO/ MSPO Supply Chain</i> '. The procedure was kept in file RSPO Supply Chain. Appropriate changes were also made in the change. b) The Mill Assistant Manager has been appointed as the RSPO Management Representative (RSPO MR) having the overall responsibility and authority over the implementation of the supply chain requirements. Based on interview with RSPO MR, it was noted that he understands the standard requirement as well as their internal RSPO Supply Chain system within the organization.
D 3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Available.
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.	Dara Lam Soon POM has continued received and process certified FFB came from own supply base/estates namely Dara Lam Soon Estate. All delivery documents of certified FFB 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.	Based on the records available, it was found that there is overproduction for Projected PK IP. From Jan 2018 – Dec 2018, Dara Lam Soon POM had overproduction of PK IP which was projected as 5,532 mt and the mill yet to apply extension to the RSPO, therefore Major NCR MZK 04 2019 was raised.
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.	Daily production report being generated (receiving, processing & dispatch) Rated throughput 45mt/hour Avg. OER 2018 21.07%, KER 5.76% To date OER 2019 Dara Lam Soon POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. The 3-monthly data was the summary from their daily template as mentioned above.
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.	DLSPOM has not receive & process any non- certified crop, received all from own IP certified plantation – Dara Lam Soon Plantation/ Estate
D.6.2	The objective is for 100 % segregated material to be reached.	With DLSPOM only process FFB of their own supply base, they have total storage facility of CPO 4100mt & PK 585mt. These facilities were well enough to cater for their daily production.

Status of Non-conformities Previously Identified

NCR No. & Indicator	Specification Major/Minor	Non-conformances	Corrective Action	Status & 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 Verification by Auditor: 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.	Verification: This has been complied. Both estates and mill had established respective business plan and elaborated in 3.1.1. Status: Closed
4.1.1	MAJOR MAR 02 2018	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 POM.	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. Verification by Auditor: Copy of Standard Operating Procedures involving all operational matters were provided by management of DLS POM.	Verification: This has been complied. Both estates and mill had established respective SOP relating to the activities /stations and elaborated in 4.1.1. 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. Verification by Auditor: DLS have provided copy of road maintenance program. Corrective action plan accepted.	Verification: This has been complied. The estates had established a road maintenance details providing type of repair and months and elaborated in 4.3.3. Status: Closed
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 Verification by Auditor: Copy of training attendance were provided. Corrective action plan accepted.	Verification: Training related to IPM has been conducted dated 9/1, 10/1, 11/1 and 19/10/18 respectively. Details of training as shown in 4.5.2 Status: Closed

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2.2.2	MINOR MZK 01 2018	<p>There was no evidence of physical markers located and visibly maintained along the legal boundaries</p> <p>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.</p>	<p>Corrective Action: Extra Physical Markers have already been erected along the legal boundaries at a closer distance and easily visible as per attached photos.</p> <p>Verification by Auditor: Corrective action plan accepted</p>	<p>Verification: The physical markers along the perimeter adjacent forest reserve , villagers, and Private oil Palm companies are available and visibly maintained between Dara Lam Soon Estate and Bukit Ibam Forest Reserve, villagers Kota Perdana, Kg Orang Asli (Kg Terubing, Kg Padang, Kg Dungun and the other neighbouring private oil palm companies such as Boustead Ladang Bebar, Ldg PSK Bukit Sumoh, Prosper Juasa Estate).</p> <p>Status: Closed</p>
5.2.1	MAJOR MZK 02 2018	<p>HCV Assessment was not comprehensive.</p> <p>Objective evidence: The HCV Assessment report was not complete to included the result from Wildlife Department and Forestry Department Assessment.</p>	<p>Corrective Action: Will make HCV report more comprehensive when receive Reports from forestry department</p> <p>Verification by Auditor: Auditor has received new HCV assessment which include assessment report from Perhilitan and Forestry Department.</p>	<p>Verification: The report "High Conservation Value (HCV)/Biodiversity Assessment of the estates Lam Soon Plantations is available. The report was conducted internally with collaboration with Wildlife Department and Forestry Department on date 5-25 September 2017 and the report was completed on May 2018. The study had covered all the High Conservation Value (HCV)/Biodiversity within and adjacent to the 1 estates under Dara Lam Soon CU.</p> <p>Status: Closed</p>
6.1.1	MAJOR MZK 03 2018	<p>Social Impact assessment was not comprehensive.</p> <p>Objective evidence: Social Impact Assessment was not complete to include records of meetings with stakeholders.</p>	<p>Corrective Action: Stakeholder comment and input already include in the SIA Report. Estate Management will monitor and solve the issue accordingly.</p> <p>Verification by Auditor: Auditor has verify new SIA and verify. Estate management already include all the input from Stakeholder.</p>	<p>Verification: Social Impact Assessment (SIA) covering Dara Lam Soon POM and Dara Lam Soon Estate was carried out by the Social Liaison Officer at Dara Lam Soon CU. The Report was done on 30 September 2017 with the participation of internal and external stakeholders, namely workers, union, contractors, suppliers, local community, local government and private entities. Records of meetings with the relevant stakeholders were duly documented and sighted. And Amendment meeting regarding SIA has been conduct on 23/4/18 to highlight the issue regarding Housing in front of the estate, regarding boundary marking, gate open and etc. Records of meetings, attendance list with the all relevant stakeholders were available, documented and sighted during this Surveillance Audit. Auditor found that the SIA was comprehensive due to the CU has obtain</p>

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				information from all of the stakeholder affected by the CU. Status: Closed
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. Verification by Auditor: Auditor has verify new SIA and verify. Estate management already include all the input from Stakeholder.	Verification: Auditor has read the SIA report and found that all comment from stakeholder has been included in the report. cross refer to 6.1.2 Status: Closed
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 JKPP Kota Perdana to 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.	Corrective Action: Management already had meeting with JKPP 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 Soon partnership. 2. The land status and engaged a licence survey out to do a proper boundary marked. Verification by Auditor: 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	Verification: This has been complied. Auditor has reviewed the new SIA action Plan and elaborated in 6.1.3 Status: Closed
2.1.1	MAJOR MZK 06 2018 & MAJOR RAR 03 2018	1-#NCR No : MZK 06 2018 - Dara Lam Soon POM <i>Jadual Pematuhan</i> , License No.: 004151. EFB Dumping Area was not proper. Objective evidence: Leachate from the EFB stock yard was found to be flowing into the monsoon drain. 2-#NCR No : RAR 03 2018	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. 2- RAR 03 2018 <u>Dara Lam Soon POM</u> Chemical exposure monitoring and boundary noise monitoring have been	Verification: 1. During site visit at EFB stock yard area sighted an evidence installation of perimeter drainage has been used to channel leachate from EFB to the effluent pond 2. Audiometric test was carried out on 22/01/2019 for 90 workers/staffs by a registered OHD Dr Siow Shin Yee (JKPP NO. HQ/13/DOC/00/330). The test report indicated that a total of persons were identified with

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		<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 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>obtained from certified hygiene technician (ENV Consultancy & Monitoring Services Sdn Bhd to monitor 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)). Verification by Auditor: 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. - auditor has found a awarded tender to ENV Consultancy & Monitoring Services Sdn Bhd to conducted Chemical monitored and hearing impairments 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.</p>	<p>hearing impairment with 22 persons need to be retest on 15/03/2019. Sighted quotation has been made to conduct retest hearing test by Special mobile safety supplies Sdn Bhd - Noise survey & mapping (generator set) ha been conducted at housing complex at Bandar 12 to monitored impact on nearby residence. Sighted the results were indicate noise were below stipulated limits for that areas. Status: Closed</p>
4.7.2	MAJOR RAR 01 2018	<p>At Dara Lam Soon Estate</p> <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. 	<p>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. Verification by Auditor: Auditor has verified the evidence that consultation with OSH committee has been revised an included the new activity in HIRARC such “memebaja kebun, mengangkat buah di kebun , etc” with letter dated 01/02/2018.</p>	<p>Verification: At Dara Lam Soon Estate, HIRARC was prepared by safety and health coordinator, Mr. Rozy Bin Ramli (OSH officer), updated on 01/11/2017 to cover all activities in estate operation such as office, harvesting, spraying, manuring, rat baiting, diesel storage, chemical storage, orchard, etc. Status: Closed</p>
5.1.1	MAJOR RAR 02 2018	<p>Environment impact aspect (EIA) was not clearly identified, predicting, and evaluating for activities in Dara Lam Soon Estate and Mill.</p>	<p>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</p>	<p>Verification: Dara Lam Soon CU has established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact (EI) covers</p>

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			<p>and plantation activities. Verification by Auditor: 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.</p>	<p>the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the palm oil mill effluent (POME) and land contamination related to the management of scheduled wastes and domestic waste. For the estate operation, all activities from harvesting, manuring, weeding, nursery, pest and disease, upkeep programme until delivery to mill were identified. Status: Closed</p>
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).	<p>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. Verification by Auditor: Corrective action plan accepted.</p>	<p>Verification: Water samples from the catchment are taken on 6 monthly basis and analyzed Details of analysis was sighted as per results dated 14/12/18 by Allied Chemists Laboratory Sdn Bhd. Results within the standard parameters. Acidity level recorded at 6.6 within range of 6.5 to 8.5. Status: Closed</p>