



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

File Ref. : ES10170013

RSPO PUBLIC SUMMARY REPORT

CLIENT : SERI INTAN STRATEGIC OPERATING UNIT
PARENT COMPANY : SIME DARBY PLANTATION BHD
RSPO MEMBERSHIP No.: 1-0008-04-000-00

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	
SOU 5 – Seri Intan	Seri Intan POM	3°58'9.22"N	100°59'8.01"E	Kilang Kelapa Sawit Seri Intan, Bt.5 Jln. Maharaja Lela, 36009 Teluk Intan, Perak
	Seri Intan Estate	3°58'13.34"N	100°58'48.51"E	Seri Intan Estate, 36009 Teluk Intan, Perak
	Sabrang Estate	3°58'35.70"N	100°58'26.02"E	Sabrang Estate 36009, Teluk Intan, Perak.
	Sungai Wangi Estate	4°14'33.2"N	100°42'50.6"E	Ladang Sungei Wangi, 32000 Sitiawan, Perak
	Sogomana Estate	4°4'N	100°7'E	Ladang Sogomana, 32500, Changkat Kruing, Perak

MAP : See Attachment 1

AUDIT DATE : 17-21 DECEMBER 2018

DURATION : 15.0 auditor days

TYPE OF AUDIT :



Annual Surveillance Audit No. 3



Recertification Audit

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

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

VALIDITY OF RSPO CERTIFICATE : 03 MARCH 2016 - 02 MARCH 2021

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Name : **SELVASINGAM T. KANDIAH**

Signature :

Date : **1/04/2019**

Acknowledgement by Client's Representative

Name :

SIME DARBY PLANTATION BERHAD
 Company No. : 547756-V
 SABRANG ESTATE

Signature :

Date :

2/4/2019

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

Annual Surveillance Audit 1				
On-site audit date	: 3-6 January 2017	No. of auditor days	: 12	
Audit team	: Mohd Razman Salim, Mohd Zulfakar Kamaruzaman, & Rozaimie Ab. Rahman			
No. of major NCR	: NA	Indicator: NA	Closing date	: 27 February 2017
No. of minor NCR	: 4	Indicator : 2.1.3, 4.1.2, 4.5.2 & 4.8.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers	Suppliers
	√		√	√
	Contract workers	NGOs	Govt. agency	Independent growers
	√	NA	NA	
	Indigenous people	Contractor	Others (Please specify)	
	NA	√		
Supply base sampled	: Sungai Wangi Estate & Sogomana Estate			
Changes since the last audit	: During this audit, there were changes for planted area in Sg. Wangi Estate with additional of 79.74 ha due to replanting programme at Bilham Division in 2014. This immature field was not updated in the planted area figure during the audit in 2015. While at Sogomana Estate, management has decided to add Cashwood Division and Sg. Bruas Division into Sogomana Estate during this audit. Therefore, planted area and certified area for Sogomana Estate has increased. Thus, the latest total planted area for Sogomana Estate is 2,101.29 ha [Cashwood Division (767.69 ha) and Sg. Bruas Division (267.94 ha)]. While the total certified area is 2,215.98 ha - Cashwood (802.87 ha) and Sg. Bruas (291.15 ha).			

Annual Surveillance Audit 2				
On-site audit date	: 26-28/12/17	No. of auditor days	: 12	
Audit team	: Hazani Othman, Ruzita Abd. Gani, Mohd. Zulfakar Kamaruzaman & Rozaimie Ab Rahman			
No. of major NCR	: 6	Indicator: 2.1.1, 4.1.2, 4.4.2, 4.7.2, 4.8.1, D4.1.	Closing date	: 27/2/18
No. of minor NCR	: 1	Indicator : 5.6.3		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities	Suppliers
	√	NA	√	√
	Contract workers	NGOs	Govt. agency	Independent growers
	√	NA	NA	NA
	Indigenous people	Contractor	Others (Please specify)	
	NA	√	NA	
Supply base sampled	: Seri Intan Estate (Main Div) & Sabrang Estate			
Changes since the last audit	: No significant changes observed. However, noted that in Sabrang Estate, the Manager had tender for resignation and on leave during the conduct of audit. At the same time, one of his Assistant Managers was transferred to sisters' estate.			
Report approved by	: Radziah Mohd Daud	Approval date	: 5/04/2018	

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Annual Surveillance Audit 3				
On-site audit date	:	17 – 21/12/2018	No. of auditor days :	15.0
Audit team	:	Selvasingam T Kandiah, Ruzita Abd. Gani Hazani Othman, Ismail Adnan Abdul Malek, Khairul Najwan Ahmad Jahari and Suzalina Kamararifin		
No. of major NCR	:	3	Indicator: 1.1.2, 4.7.3 & 7.8.1.	Closing date : 19/03/2019
No. of minor NCR	:	2	Indicator: 5.3.3 & 6.5.4	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
		√		Independent growers
		Indigenous people	Contractor	Others (Please specify)
		NA	√	
Supply base sampled	:	Sungai Wangi Estate, Sogomana Estate, Seri Intan Estate (Main Div) & Sabrang Estate		
Changes since the last audit	:	1) On Sungai Wangi Estate, 200.90Ha planted with Guava had been now planted with Oil Palm. 2) The Palm Oil Mill manager Mr. Mohd Nazir Pazal Karim has been transferred out and replaced by Mr. Azman Talkah.		
Justification of audit planning	:	Total allocation of audit man day for SOU Seri Intan were: <ul style="list-style-type: none"> • Seri Intan POM = 3 auditor days (for safety and health, environment, mill best practices, GHG verification, etc with 1 day for supply chain certification systems) • Sogomana Estate, Sungai Wangi Estate, Seri Intan Estate and Sabarang Estate = 3 auditor days for each estates (monitoring on critical areas such as buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc. verified safety) 		
Report approved by	:	Radziah Mohd Daud	Approval date : 1/04/2019	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Dec 2015 – Nov 2016	Jan – Dec 2017	Jan - Dec 2018	Jan - Dec 2019	
Certified FFB Processed (MT)	203,571.32	209,794.50	235,763.59	213,459.86	
Production of Certified CPO (MT)	43,272.58	45,639.640	53,333.26	46,961.17	
Production of Certified PK (MT)	11,226.94	11,538.700	12,966.99	11,740.29	
Certified Areas (Ha)	11,244.62	11,244.62	11,244.62	*11,296.76	
Planted Areas (Ha)	-	10,107.17	10,107.17	*10,300.55	
Production Areas (Ha)	8,075.21	8,307.07	8,288.48	8,119.12	
HCV Areas / Conservation Areas (Ha)	37.05	37.05	37.05	**37.05	
REMARKS	<p>*The difference of certified and planted area reported this year has been based on the evidence provided for the closure of NCR RA01-2018 raised during the conduct of audit. Refer to Attachment 4 in this report for details. **The HCV values are expected to be revised (increase) to include the areas from Seri Intan estate.</p>				

TABLE 2

	PO	PK
Last years certified volume (MT)	53,333.26	12,966.99
Last years actual certified sold (MT)	35,462.23	9,324.93
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	6,126.30	1,591.98
New year certified volume (MT)	46,961.17	11,740.29

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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
Selvasingam T Kandiah	Trainee Lead Auditor / GAP, safety & health	Holds a B.Sc. (Hons) in Agriculture, he had work as a planter with Kumpulan Guthrie Berhad for 28 years including one year in Liberia and 2 years in Estate Department in Guthrie Headquarters.
Hazani Othman	Auditor / Social, Environment, HCV	Holds a Bachelor of Forestry Science and Diploma in Forestry, from the Universiti Putra Malaysia. He is a lead auditor for ISO 14001, FSC & MTCC FMC and CoC and RSPO P&C.
Ruzita Abd Gani	Auditor / Environment, safety & health, milling practice	Possessed Bachelor of Chemical Engineering from the University Technology Malaysia. She had worked in the palm oil mill for more than 6 years and 16 years of working experience as environmental and OHS lead auditor. She is also a qualified Lead Auditor for RSPO P&C, MSPO and RSPO Supply Chain.
Khairul Najwan Ahmad Jahari	Auditor / Social	Possessed B.Sc. of Forestry from Universiti Putra Malaysia with total more than 17 years of working experience in the Forest Management, forest inventories, forest harvesting, remote sensing & GIS. He had 7 years of working experience in the oil palm operation including auditing in HCVF and social issues. He is a qualified Lead Auditor for RSPO P&C, MSPO, and Forest Management (FMC).
Ismail Adnan	Auditor / Social & HCV	Holds a Master of Forestry degree from University of British Columbia, Canada. He had more than 25 years of working experience in the Natural Forest and Plantation Forest operations and management. He is a qualified Lead Auditor in MC&I (Natural Forest and Forest Plantation). And, an auditor in RSPO and MSPO (HCVF, Biodiversity, Social).
Suzalina Kamaralarifin	Auditor / Supply Chain	Holds a B.Sc. in Chemical Industry. She had more than 5 years of working experience in oil palm related industry i.e. palm oil mill and oleo chemical refinery. She is a qualified RSPO Supply Chain Lead Auditor.

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1.3 Audit methodology

The audit covered the Seri Intan palm oil mill and four of its supply bases. The audit included an on-site audit to the estates, mill and relevant stakeholders 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

Date of next audit :

1.6 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

2.1 Description of the certification unit

The Seri Intan Certification Unit (Seri Intan CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad (SDPB). The SOU is also known as SOU 5. The Seri Intan CU comprises of the Seri Intan Palm Oil Mill (Seri Intan POM) and four supply base i.e. Sabrang Estate, Sungai Wangi Estate, Seri Intan Estate and Sogomana Estate which are all owned by SDPB. The Seri Intan POM had a mill capacity of 60 mt/hr.

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

The FFB is sourced from company owned estates that are certified - Sabrang Estate, Sungai Wangi Estate, Seri Intan Estate and Sogomana 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 (%)	
Seri Intan	53109.57	27.28	SIRIM
Sabrang	53755.73	27.62	SIRIM
Sungai Wangi	29085.41	14.94	SIRIM
Sogomana	34534.82	17.74	SIRIM
Bikam	22713.91	11.67	SIRIM
Cluny	980.94	0.50	SIRIM
Kinta Kelas	467.60	0.24	BSI
Total	194,647.98	100.00	

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Table 2: Projected FFB production by supply base for the next reporting period (Jan 2019- Dec 2019)

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Seri Intan	58679.06	27.49
Sabrang	59392.98	27.82
Sungai Wangi	32135.54	15.05
Sogomana	38156.41	17.88
Bikam	25095.87	11.76
Grand Total	213,459.86	100%

Table 3: Actual FFB received and CPO & PK dispatch by Seri Intan POM for the last reporting period (Jan 2018 - Dec 2018)

	Total (MT)
FFB Received	194,647.98
FFB Processed	194,580.60
CPO Production	41,612.544
PK Production	10,931.378
CPO delivered as RSPO certified	35,462.23
CPO delivered under other schemes (MT)	-
CPO delivered as non-RSPO certified	6,126.30
PK delivered as RSPO certified	9,324.93
PK delivered under other schemes (MT)	-
PK delivered as non-RSPO certified	1,591.98
Credits traded thru Book & Claim	-

Table 4: Projected FFB received and CPO & PK dispatch by Seri intan POM of the next reporting period (Jan 2019 - Dec 2019)

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	213,459.86
FFB Processed	213,459.86
CPO Production	46,961.17
PK Production	11,740.29
CPO delivered as RSPO certified	40,062.48
CPO delivered as non-RSPO certified	6,898.69
PK delivered as RSPO certified	10,232.50
PK delivered as non-RSPO certified	1,507.79

Table 5: Planted and certified area of the Seri Intan CU

Estate	Planted (ha)	Certified (ha)
Seri Intan Estate	2,500.45	2,910.79
Sungai Wangi Estate	2,002.59	2,226.66
Sogomana Estate	2,101.29	2,214.08
Sabrang Estate	3,696.22	3,945.23
Total	10,300.55	11,296.76

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Table 6: Planting profile for Seri Intan Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1995	2nd	Mature	419.26	16.77
1996	2nd	Mature	348.79	13.95
1997	2nd	Mature	171.09	6.84
1998	2nd	Mature	134.39	5.37
2004	2nd	Mature	221.19	8.85
2005	2nd	Mature	175.96	7.04
2007	2nd	Mature	173.87	6.95
2009	2nd	Mature	142.35	5.69
2013	3rd	Mature	165.55	6.62
2015	3rd	Immature	169.46	6.78
2017	3rd	Immature	378.54	15.14
TOTAL			2,500.45	100.00

Table 7: Planting profile for Sungai Wangi Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	3rd	Immature	308.57	15.41
2017	1st	Immature	200.90	10.04
2017	2nd	Immature	19.07	0.95
2018	3rd	Immature	101.41	5.06
2014	3rd	Mature	79.64	3.98
2012	1st	Mature	272.55	13.61
2006	2nd	Mature	18.27	0.91
2004	2nd	Mature	17.72	0.88
2000	2nd	Mature	251.28	12.55
1999	2nd	Mature	581.37	29.03
1997	2nd	Mature	151.81	7.58
TOTAL			2,002.59	100.00

Table 8: Planting profile for Sogomana Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2016	3rd	Immature	137.97	6.56
2017	3rd	Immature	286.13	13.62
2015	3 rd	Mature	74.16	3.53
2014	3 rd	Mature	202.37	9.63
1999	2 nd	Mature	669.26	31.85
1998	2 nd	Mature	687.38	32.71
1997	2 nd	Mature	44.02	2.10
TOTAL			2,101.29	100.00

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Table 9: Planting profile for Sabrang Estate

Year of planting	Planting cycle (1st, 2nd, 3 rd , Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1997	2 nd	Mature	163.54	4.43
1998	2 nd	Mature	186.62	5.09
2000	2 nd	Mature	388.73	10.52
2001	2 nd	Mature	358.46	9.70
2002	2 nd	Mature	417.89	11.31
2003	2 nd	Mature	100.18	2.71
2005	2 nd	Mature	121.31	3.28
2006	2 nd	Mature	185.76	5.03
2008	2 nd	Mature	134.14	3.63
2010	2 nd	Mature	270.08	7.31
2011	2 nd	Mature	98.11	2.66
2012	2 nd	Mature	96.29	2.61
2013	3 rd	Mature	238.3	6.45
2015	3 rd	Mature	357.43	9.67
2016	3 rd	Immature	266.05	7.20
2017	3 rd	immature	313.33	8.48
TOTAL			3,696.22	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Azman Bin Talkah
Position	:	Mill Manager
Address	:	Kilang Kelapa Sawit Seri Intan Bt. 5 Jln. Maharaja Lela, 36009 Teluk Intan, Perak
Phone no.	:	05-6221911
Fax no.	:	05-6214091
Email	:	Azman talkah@simedarbyplantation.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 (Refer to Attachment 7 for the time bound plan)

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

There was 3 SOU located in Indonesia, Papua New Guinea (NBPOL), and Liberia not yet certified, Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

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

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 NA

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.)

- 1) The contact person, the Mill Manager, is now Mr. Azman Bin Talkah. He has replaced Mr. Mohd Nazir Pazal Karim who has been transferred.
- 2) There is now an increase of total planted area at Sungai Wangi estate due to new planting i.e. conversion guava to oil palm.

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.

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4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of major NCR(s)
(details refer to Attachment 4) List : 3 1.1.2, 4.7.3 & 7.8.1.

Total no. of minor NCR(s)
(details refer to Attachment 4) List : 2 : 5.3.3 & 6.5.4

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

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

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

5.0 AUDIT CONCLUSION

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

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.

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 : **Selvasingam T Kandiah**

(Name)



(Signature)

19/03/2019

(Date)

Map of SOU 5 – Seri Intan CU



SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit.
- (iii) To make appropriate recommendations based on the audit findings.

2. Date of assessment : 17 to 21 December 2018

3. Site of assessment :
 : Seri Intan Palm Oil Mill
 Seri Intan Estate
 Sabrang Estate
 Sungai wangi Estate
 Sogomana Estate

4. Reference Standard:

- a. RSPO P&C MYNI:2014
- b. RSPO Certifications Systems for P&C, June 2017
- c. RSPO Supply Chain Standard, November 2014 (Revised 14 June 2017)
- d. Company's audit criteria including Company's Manual / Procedures

5. Assessment Team

- a) Lead Auditor : Selvasingam T. Kandiah (GAP, Safety)
- b) Auditor : Ruzita Abd. Gani (Safety, Environment, Mill)
 Hazani Othman (Social, HCV)
 Ismail Adnan Abdul Malek (Social, HCV)
 Khairul Najwan Ahmad Jahari (Social)
 Suzalina Kamararifin (SC)

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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Date / Time	Coverage of audit / Activity / Site	Selva	Hazani	Ruzita	Ismail	Najwan	Suzalina
Day 1: 17 December 2018 (Monday)							
9.30am – 9.45am	<p>Opening Meeting – Venue: Seri Intan Estate</p> <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO & MSPO implementation, significant change on organization activity, structure, certified areas, machineries, FFB supply bases & volume , Time bound plan, actions taken to address previous audit findings. 						
9.45am – 12.30pm	<p>Site observation to Seri Intan POM P1, P2, P3, P4, P5, P6, P8</p> <ul style="list-style-type: none"> Milling Practices Environmental, Occupational safety & health aspects Legal compliance Social aspects - SIA, management plan & implementation, workers' quarters <p>Interview with workers, contractors & relevant stakeholders</p>						
	<p>Site observation to Seri Intan POM</p> <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters, Interview with workers, contractors & stakeholders. 						
1.00pm – 2.00pm	Lunch Break / Solat Zuhur						
2.00pm – 5.00pm	Continue audit						
Date / Time	Coverage of audit / Activity / Site	Selva	Hazani	Ruzita	Ismail	Najwan	Suzalina
Day 2: 18 December 2018 (Tuesday)							
8.30am – 12.30pm	<p>Site observation to Seri Intan POM</p> <ul style="list-style-type: none"> RSPO Supply Chain Certification Standard implementation including model requirements 						

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	Site observation to Sungai Wangi Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Legal compliance • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Environmental, Occupational safety & health aspects • Social aspects - SIA, management plan & implementation, workers' quarters, • Observed protected sites with HCV attributes • Interview with workers, contractors & relevant stakeholders 						
1.00pm – 2.00pm	Lunch Break / Solat Zuhur						
2.00pm – 5.00pm	Continue audit respective sites						
Date/Time	Coverage of audit / Activity / Site	Selva	Hazani	Ruzita	Ismail	Najwan	Suzalina
Day 3: 19 December 2018 (Wednesday)							
	Site observation to Sogomana Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Legal compliance • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Environmental, Occupational safety & health aspects • Legal compliance • Social aspects - SIA, management plan & implementation, workers' quarters, • Observed protected sites with HCV attributes • Interview with workers, contractors & relevant stakeholders 						
8.30am – 1.00pm	Lunch Break / Solat Zuhur						
1.00pm – 2.00pm	Continue audit at respective sites						
Date/Time	Coverage of audit / Activity / Site	Selva	Hazani	Ruzita	Ismail	Najwan	Suzalina
Day 4: 20 December 2018 (Thursday)							

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8.30am – 1.00pm	Site observation to Seri Intan Estate P1, P2, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Verification of basic information mill & estate • Confirmation of time bound plan & review of partial certification • Environmental, Occupational safety & health aspects • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM • New planting 						
1.00pm – 2.00pm	Lunch Break / Solat Zuhur						
2.00pm – 5.00pm	Continue assessment at respective sites						
Date/Time	Coverage of audit / Activity / Site	Selva	Hazani	Ruzita	Ismail	Najwan	Suzalina
Day 5: 21 December 2018 (Friday)							
8.30am – 12.30pm	Site observation to Sabarang Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Legal compliance • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Environmental, Occupational safety & health aspects • Legal compliance • Social aspects - SIA, management plan & implementation, workers' quarters, • Observed protected sites with HCV attributes • Interview with workers, contractors & relevant stakeholders 						
12.30pm – 2.30pm	Lunch Break / Solat Zuhur / Solat Jumaat						
2.30pm – 3.30pm	<ul style="list-style-type: none"> • Verification on outstanding issues • Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any) 						
3.30pm -5.00pm	<ul style="list-style-type: none"> • Closing meeting at Seri Intan Estate • RSPO : Presentation of audit findings, positive comment, • Question & answer 						

Note: Time and duration shown are approximate. Subject to weather, field visits may change accordingly, if necessary.

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Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicators	Comply Yes/No	Findings	
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1	Yes	The management of (SOU 5) – Seri Intan Estates had communicated relevant information to stakeholders on social aspects related to sustainable practices according to communication procedure as outlined in their Estate / Mill Quality Management System document. An information requested by Department of Environment (DOE) for purpose of registration on on-line scheduled wastes system (e-swis) information about premise i.e. full company name, address location ,estate manager, scheduled waste name , scheduled waste code were provided timely by CU. Information provided through emails.Records of communication (letters, minutes of stakeholders meeting, attendance sheets etc.) are kept and maintained by each estate.	
	1.1.2	No	Other than regular submission to relevant authorities i.e. MPOB, DOE, DOSH, there are no additional request of information received on environmental, social and legal issues from stakeholders. However, records of request for information regarding RSPO certified was found incorrect as the RSPO certified area for SOU 5 Seri Intan was not accurate, i.e. Data provided for Annual Surveillance Audit (ASA) 2017 and ASA 2018. ASA 2018 certified area given those not reflect the record provided at the time of audit. Thus the Major NCR RA 01 2018 was issued.	
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 (Criterion 2.2);	Yes	Information relating to land titles are available at the SDPB website at http://plantation.simedarby.com . The auditor has verified the land titles for the CU and confirmed that the CU is owned by SDPB.
		Occupational health and safety plans (Criterion 4.7);	Yes	SDPB continued to use internet for disseminating public information. Information relating to safety and health plans maintained available through SDPB website at http://www.simedarbyplantation.com .
		Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	Yes	Information relating to environmental and social impacts maintained available through SDPB website at http://www.simedarbyplantation.com . The environmental and social impacts assessments and its relevant plans continued made available. Cross-refer to Criterion 5.1 and 6.1 for environmental and social respectively.
		HCV documentation summary (Criteria 5.2 and 7.3);	Yes	HCV documentation summary is available in the 'HCV Re-Assessment for strategic operating unit (SOU) 5 Seri Intan – Table 8 Summary of HCV tasks'.
		Pollution prevention and reduction plans (Criterion 5.6);	Yes	Annual environmental Improvement Plan / Pollution Prevention maintained established and available.
		Details of complaints and grievances (Criterion 6.3);	Yes	No complaint or grievances were observed.
		Negotiation procedures (Criterion 6.4);	Yes	Negotiation procedure maintained available.
		Continual improvement plans (Criterion 8.1);	Yes	The CU maintained publicly available its continuous improvement plan. (Cross-refer to Criteria 8.1).
Public summary of certification assessment report;	Yes	The public summary made publicly available at website by SIRIM QAS.		

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		Human Rights Policy (Criterion 6.13).	Yes	The human rights policy maintained available. The policy is posted at office notice boards.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	Yes	The documented policy committing to a code of ethical conduct and integrity of the company maintained available. The CU continued communicated the policy to their staffs including foreign workers during the induction course.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators	Comply Yes/No	Findings	
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	Yes	Generally, the CU continued to comply with most of relevant applicable laws and regulations. a)
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	Yes	Seri Intan CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the mill operations. The mill has its own Legal and Other Requirements Register (LORR) and were being evaluated annually for its compliance. The legal registers were updated by the person in-charge and approved by manager of respective operating unit.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	Yes	The mechanism to ensure compliance to legal and other requirement maintained implemented, as documented in EQMS & MQMS (Estate / Mill Quality Management System) under Standard Operation Manual. There was evidence of compliance to legal requirements and that it had been evaluated on an annual basis. These compliances were also ensured by PSQM Internal Audits, PA visits and by RSPO Audits. The CU has conducted internal audit and Group corporate assurance department to check status of
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	Yes	The tracking for changes in the law was carried by PSQM Department, Group Compliance Office based at SDPB headquarters in Kuala Lumpur and disseminated to mill which then updates its legal register from time to time. This mechanism was outlined in its procedure ref.: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. The latest review and evaluation of their legal register was in 26/11/2018 where Employment Insurance Scheme Act 2017 was added.
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 Native Customary Right (NCR) land) and the actual legal use of the land shall be available. Major Compliance	Yes	Copy of legal ownership of the lands for the audited supply base was available. All original copies of ownership documents are kept at the Sime Darby Headquarters in Kuala Lumpur. At Sabrang Estate, there are 32 grants, all are freehold and ownership is SDPSB. At Seri Intan, there are 12 titles, at Sungai Wangi 24 titles and at Sogomana 12 titles. For some of titles of these 3 Estates the transfer of ownership from previous owners to Sime Darby is still ongoing. Copy of the letter addressed to the Lembaga Tanah Ladang, Negeri Perak, pertaining to the application for transfer of land ownership from Golden Hope Plantations Sdn Bhd to Sime Darby Plantation Sdn Bhd was sighted. Some of the grants/titles are for cultivation of rubber, orchard and sugar cane. In the letter to Lembaga Tanah Ladang, Negeri Perak, it was noted that the conversion of the land to oil palm had been included.

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	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	Yes	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to the surrounding villages at Sabrang Estate and Seri Intan Estate. Site visit to all boundary with villagers found markers are available and maintained. The markers have also been confirmed during the consultation with all the interviewed village heads.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). Minor Compliance	Yes	It has been confirmed that no cases of dispute were observed.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. Major Compliance	Yes	Review of documented stakeholders meeting and interview with confirmed that there was no dispute on ownership or right to use of land.
	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 (incl. neighboring communities and relevant authorities where applicable). Minor Compliance	Yes	Review of documented stakeholders meeting and interview with confirmed that there was no dispute on ownership or right to use of 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	NA	There was no evidence that oil palm operations have been instigated violence in maintaining peace and order in their current and planned operations. Hence, there was no need to avoid any escalation of conflict.

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<p>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.</p>	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). Major Compliance	NA	There were no issues regarding land with villagers, local community and neighbouring estate. Hence, there was no need for the participatory mapping.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: 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 the company's title, concession or lease on the land. Minor Compliance	NA	There were no issues regarding land with villagers, local community and neighbouring estate. Hence, the copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.
	2.3.3	All relevant information shall be	NA	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Seri Intan CU.

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		available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance		
	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	NA	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Seri Intan 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 (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	Yes	All 4 Estates and the Mill in Seri Intan CU continued to make commitment to long-term economic and financial viability. The annual budgets for 2017/18 to 2020/2021 were sighted. The budget provided provisions of activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance, etc. The budget for Estates also included projections on yield/ha, and total cost of production per MT & per ha.
	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 replanting programme for the next five years had been prepared as sighted in the Long Range Replanting Programme (LRRP) 2017/2018 to 2036/37. This programme is reviewed once a year and is incorporated in their annual financial budget.

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

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored	4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	Yes	Seri Intan mill and Estates continued to use the; Plantations Quality Management System (PQMS) Manual, Standard Operating Manual and Procedures (SOP), Agriculture Reference Manual (ARM) etc
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place.	Yes	The mechanisms to check the implementation of procedures were carried out through internal audit, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. However, during site visit it was observed that not all appropriate protective equipment were used by workers at

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		Minor Compliance		place of work and vehicles were not maintained as per SOP. The Major NCR STK 01 2018 was thus issued under indicator 4.7.3.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	Yes	The CU continued to keep records of monitoring and actions taken for a minimum of 12 months. Monthly Costing and Annual Reports on monitoring of all activities were made available.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	Yes	There was no third party FFB supplier send their FFB to Seri Intan POM.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	Yes	Seri Intan 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 recommendations. Maintaining soil fertility is guided by its SOPs in a few chapters: EQMS chapter B8 - Leguminous Cover Crops, EQMS chapter B14 – Manuring, ARM Section 8 - Manuring
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	Yes	Records of programs and applications of fertilisers were made available to auditors. Fertiliser application program was monitored using records like program sheets, bin cards, Field Cost book and Manuring Checklist.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	Yes	From the reports made by the Agronomist, it was established that all 3 estates have carried out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling for N, P, K, Mg,Ca & B had been carried out and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues. Minor Compliance	Yes	Seri Intan CU had a nutrient recycling strategy where palm fronds were properly stacked in the interrow to decompose and EFB was applied at 30 - 40mt/ha in a single layer on stacked fronds. EFB will help to supplement the inorganic fertilizer thus improving the nutrient status of the field.
C 4.3 Practices minimize and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	Yes	During the field visit and the soil map provided it was observed that no fragile or marginal soils found in Seri Intan 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	Seri Intan CU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by its Slope & River Protection Policy, updated on January 2015, which was posted on the Estates notice board. It was observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	Yes	During the field visit, it was observed that the main and field roads of Seri Intan CU were in satisfactory condition and accessibility were made possible by regular maintenance. There was evidence of road maintenance program which consist of road resurfacing with grading & compaction and culvert maintenance.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A	NA	NA as Based on the soil maps provided and field visits there were no peat soils in all 4 estates in Seri Intan CU.

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		documented water and ground cover management programme shall be in place. Major Compliance		
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	NA	NA as based on the soil maps provided and field visits there were no peat soils in all 4 estates in Seri Intan CU.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	NA	NA as based on the soil maps provided and field visits there were no fragile and problem soils in all 4 estates in Seri Intan CU.
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	All 4 estates had implemented their water management plans. Plans for 2017/2018 were sighted. The management plan covered dry spell/shortage and in case of water pollution. The water management plan also addressed on de-silting of field drain to maintain the right amount of moisture in the field. Rainwater harvesting was also implemented in the beneficial plant nursery, workshop, office and store and the water was used for washing and chemical mixing were reused.
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance	Yes	All 4 Estates had continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estates. Signboard for riparian buffer zone noted erected and among information such as prohibited for intrusion, spraying of agrochemical, fishing, open burning and planting.
	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	Sighted monthly report on treated effluent discharge for the months. Among the parameters monitored are Bio-oxygen demand (BOD), Suspended Solid (SS), Total Nitrogen (TN), Oil & Grease, Ammonical Nitrogen (AN) and PH, result within the DOEs' limit. Site visit to the effluent treatment plant was observed all ponds in good condition and well maintained. No trace of effluent over flow was sighted and flow meter reading was recorded on daily basis. An interview with operator in-charge revealed that the operation was in accordance with the standard operation procedure and legal requirements.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	Yes	Mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM technique.	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	Yes	Seri Intan CU continued to implement Integrated Pest Management (IPM) in both estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM). The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	Yes	IPM Training were conducted by estate personnel based on the guidelines in the Agricultural Reference Manual (ARM) showed that training of those involved in IPM implementation was carried out on all 4 Estates at least once in 2 years. Records of training were available for verification.

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C 4.6 Pesticides are used in ways that do not endanger health or the environment	4.6.1	Justification of all pesticides used shall be 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	Yes	Seri Intan CU continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease.
	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	Seri Intan 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 for verification.
	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	As part of the IPM plans, management of all 4 estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. As mentioned in 4.5.1, during the visit it was observed that all estates had plants ready for planting in their Nurseries.
	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	The estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii & class iv.

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4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). Major Compliance	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. Training on pesticide handling – spraying technique was carried out at all estates and the training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures.
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 (514) and Regulations and Orders, Pesticides Act 1974 (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). •
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	Yes	During the audit, it was noted that, Seri Intan CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Paraquat had not been used in the CU.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	Yes	Aerial spraying was not practiced by all estates. There was no evidence to show that any had been carried out. All estates only practices circle spraying and selective spraying which was only for targeted species such as woodies and VOPS.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated	Yes	The staffs 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. Training on pesticide handling was carried out on all 4 Estates at least once in 2 years. As mentioned under Indicator 4.6.7 training had been conducted and records of training were available for verification.

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		or made available. Minor Compliance		
	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	Domestic waste generated from workers quarter were disposed to local authority waste collection areas.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	Yes	All sprayers, store keepers, foremen, water treatment operator and workers handing pesticides in all estates were sent for annual medical surveillance and the records were reviewed by the audit team.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	Yes	There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in Seri Intan CU. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. Monitoring of pregnancy and lactating was conducted on every month by the estate Hospital and Medical Assistants. Sighted records of health monitoring for sprayers, manuring operators and rat bait applicators.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	Yes	SOU Seri Intan continued to have in place and adopt SDP Occupational Safety and Health Policy, signed by Dato, Franki Anthony Dass. The policy was also available in Bahasa and had been communicated to all employees through briefings and being displayed on the estates and mill notice boards. It was also communicated to all workers by the workers representative in OSH committee. A safety and health plan for 2017/2018 named Environment, Safety & Health Program was updated in July 2018 for both estates and mill. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, etc. Generally, the ESH program noted to be satisfactory.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	Yes	Most significant and routine activities for mill and estate were adequately covered activities such as chemical spraying, harvesting in the estates, boiler operation, FFB sterilisation, kernel extraction and oil extraction and clarification in the mill. Appropriate risk control measures had been determined and implemented for the respective activities and operation in the estates. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative control was sighted with safety signages were displayed at all work stations including mill and estates office and workshop. On overall performance, OSH administrative controls implementation as well as appropriate risk control measures were identified and a PIC was assigned to monitor the implementation of the control measures during field and site assessment.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practice. Adequate and appropriate protective equipment shall be	No	Training and Briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, 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

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	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>manner.</p> <p>Based on the HIRARC carried out at both estates and POM, the PPE types for the various activity were identified.</p> <ul style="list-style-type: none"> • Harvester- Safety Helmet, Sickle Cover, Hand Glove. Wellington Boots • Sprayers- Respirator, Nitrile Glove (Chemical Resistant) Goggles, Wellington Boots, Apron. • Manuring- Apron, Wellington Boots, Dust Mask, nitrile glove • Mill operator – Safety boots, ear muff, safety vest, Helmet, Cotton glove <p>Water treatment Plant Operator - Safety boots, ear muff, safety vest, Helmet, Cotton glove, Dust Mask.</p> <p>However, not all appropriate protective equipment was used by workers at the place of work and vehicles not maintained as per SOP 'Transportation System & machinery Safety, OSH procedure Doc: SD/SDP/PEQM(ESH)/201/0517.</p> <ol style="list-style-type: none"> 1. Seri Intan Estate; Worker applying fertilisers for cover crop in the 2018A replant were not using the appropriate PPE. 2. Seri Intan Estate: Tractor TF014 – 2 bolt and nuts each were missing from the left rear and front wheels and diesel and hydraulic oil were leaking. 3. Sabrang Estate – Tractor TF018 diesel and hydraulic oil were leaking. <p>Thus, the Major NCR STK 01 2018 was issued.</p>
4.7.4	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	Yes	<p>Regular safety meetings between the responsible persons and workers about safety and health were continue to be conducted by mill and estates. Safety Committee Meeting chaired by Estate Manager / mill manager has been conducted once in quarterly. The meeting minutes were made available at the estate offices and meetings have been conducted on Dec 2018, Sept 2018, June 2018 and March 2018. Among of agenda was discuss during the meeting were:</p> <ol style="list-style-type: none"> i) Previous minutes and arising matters. ii) Medical Assistant Report (Monthly Accident statistics) iii) Workplace Inspection iv) Safety programme & training v) Safety and environment issues
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance	Yes	<p>SOU 5 had continued adhered to the documented: SDP policy 'Crisis Management & Emergency Response' plan, ref: chapter 13 of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure" in chapter 14 of the same manual, Local Medical Evacuation Plan, SOP for Medical treatment Appendix 5.5.3.3, Subsection 5.5 of Standard Operation Manual (SOM). SOU 5 continued to implement procedure related to Fire, Flood, Chemical spillage, Strikes and Emergency and Accident Response. These procedure was displayed on noticeboard at several locations such as office, Muster Ground, Workshop and Dispensary.</p> <p>Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and exhibited on notice boards. Telephone numbers of the Police Station, Fire Brigade, Immigration Department and Hospital were also exhibited. The team, consisting of trained First Aiders, were Field Staffs, Mandores, Office Staff, Work shop Operator and Security personnel.</p> <p>Assigned persons to carry out emergency response included first aid boxes in the field, staff and mandores interviewed noted understood and were aware of the requirements.</p> <p>It was noted that all operating units had been provided with First Aid boxes which were checked on a monthly basis by the Medical Assistants and Hospital Assistant. Records of replenishment were verified by the auditor.</p> <p>Records of all accidents was maintained and reported to Department of Occupational Safety & Health (DOSH) annually. Quarterly reviewed was carried out during safety meeting.</p>
4.7.6	All workers shall be provided	Yes	Seri Intan Mill and Seri Intan Estate provides medical care to their workers with clinics established within the

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		with medical care, and covered by accident insurance. Minor Compliance		premises. Serious cases are referred to the Teluk Intan Hospital which is about 7 km from the site. In addition, both mill & estates continued to provide group insurance for all workers as required under the Workmen Compensation Act 1992. Sighting of records and cross check with workers showed that they were covered with valid insurance policy. Local workers are covered by SOCSO. For foreign workers, they are covered by Workmen Compensation as per the Compensation Act 1952.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	Yes	Safety meeting has highlighted on the accident no & LTI. Incident detailed report was submitted through SMS IT to PSQM, ESH unit of Sime Darby Plantation. Accident statistics are being maintained and periodically reviewed (quarterly basis) during 'Health and Safety' committee meeting – minutes reviewed.
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 programmes for 2017/2018 and 2019 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by all estates in Seri Intan CU. Training Plan for 2019 was established in Dec 2018. A training needs identification matrix has been established with target dates for the training to be conducted. Training programme observed implemented and covered the RSPO requirements.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	Yes	Seri Intan CU continued to maintain records of trainings for its employees.

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

Clause	Indicators	Comply Yes/No	Findings	
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	Yes	SOU 5 continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) covers all upstream activities such as FFB reception until downstream processes. The identification (EAI) and evaluation of environmental impact (EIE) was done for all activities and processes related to the mill operation as well as estate operation. Among the significant environmental aspects are the boiler stack emission, palm oil mill effluent (POME) discharge and land contamination from the managing of the scheduled wastes and also general wastes. For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/s Minor Compliance	Yes	There was no environmental impact observed that requires changes in current practices except new planting activity at Sg Wangi Estate. Environmental Impact associated from new planting activity was identified and necessary action was established, however it was not clearly document.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall	Yes	SOU 5 continued to maintain the Identification of the Environmental Aspect and Impact and was reviewed on July 2018. The assessment was also included existing mill and estate operation as well as replanting activity. No significant changes to the impact evaluation was noted. The Environmental Management Plan FY 2018 /

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		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		2019 comprising of Pollution Prevention Plan and Identification, Disposal and Reduction Effort of Wastes FY 18/19 updated in July 2018. Seri Intan mill continue to implement 'Pollution Identification Environmental improvement action plan'. The following parameters were being monitored & record available: i) BOD for treated effluent discharge ii) Reduce water consumption. iii) Reduce electricity consumption.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	Yes	Information was collated in a High Conservation Value (HCV) Assessment report dated December 2015, which included both the planted area and relevant wider landscape-level considerations with villages and forest reserve included. Based on the HCV assessment report, there are water catchment areas at Sogomana Estate (0.56 ha): at Seri Intan Estate, there are water catchment (12.64 ha) and river reserve at Sg. Bidor (8.85 ha): and at Sabrang Estate, there are river reserves at Sg, Perak (15.0 ha). However, there is no HCV area at Sungai Wangi Estate. The total area of HCV areas for Seri Intan CU is 37.05 ha.
	5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	Yes	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan on year 2018 at all estates. Sighted action plans for 2018 at Seri Intan Estate, Sungai Wangi and Sabrang Estate had included monitoring of HCVs. Visit to Riparian Reserves along Sg Perak at Field 96B, Seri Intan Estate and at Sabrang Estate found no chemical or spraying interventions in the reserve areas. The river reserves were well marked with adequate signage.
	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and 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	Yes	There is no RTE species identified at Seri Intan CU. Sime Darby has established disciplinary measure in accordance with national law to protect RTE species. Sighted training records showed HCV awareness training was conducted in July 2018.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; 	Yes	Action plans for FY2017/2018 was made available for all Seri Intan CU estates which prescribed monitoring and management of HCV and RTE. Records at Sabrang Estate showed monthly monitoring on HCV areas were conducted on water gate and river Buffer Zone. Since, the start the monitoring Programme, Sabrang Estate management had not found any significant finding such as illegal hunting or encroachment in the estate. Outcomes of monitoring were fed back into the action plan At Seri Wangi estate, a course titled " Environmental Responsibility & Biodiversity – EIA" was conducted for workers in Sept 2018 which addressed RTE protection as well as environmental impacts and protection.

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		<ul style="list-style-type: none"> Outcomes of monitoring shall be fed back into the action plan. <p>Minor Compliance</p>		
	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	NA	There is no HCV set-asides with existing right of local communities in Seri Intan CU.
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	SOU 5 has identified all waste products and sources of pollution. The environmental management plans were established to manage the identified waste products and source of pollution.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	Yes	Seri Intan mill continued to manage empty chemical containers as classified under scheduled waste SW409 and disposed through approved Department of Environment (DOE) licensed contractors. Sixth scheduled consignment note for disposal of empty chemical containers were verified. All transaction was reported to DOE.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	No	Seri Intan Mill has continued to implement waste management plan related to waste i.e. scheduled wastes, operational wastes and domestic wastes. Operational waste such as fibre, shell were reuse for boiler fuel, while domestic waste were collected by the local authority and disposed to designated dumping area. Although Seri Intan estate has established waste management plan for empty chemical containers but site visit it was observed several used chemical containers with residue which not triple rinse & punctured as per management plan. Therefore minor nonconformance was raised NCR RA 03 2018.
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	SOU 5 has established the Fossil fuel Management on efficiency use of fossil fuel. Among the programmed were using of fiber and shell in the boilers at the mill and for controlling of diesel usage in both estates for the tractor. The management is monitoring the consumption of fossil fuel and renewable energy on monthly basis. A plan for improving the efficiency of the use of fossil fuels and optimize renewable energy has been incorporated into the Environmental Aspect and Impact analysis
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	SDPB policy on no open burning is reflected in the EQMS-SOP-Section B2 - Under felling/clearing & land preparation and Carbon Policy. All estates practiced zero burning. During the visit to replant areas, it was evident that all palms were felled, shredded, windrowed left to decompose.
	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	Yes	As per SDPB policy on zero burning during land preparation for replanting, all estates had adhered to this policy. There was no evidence of any burning.

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		<i>Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance</i>																																																																					
<p>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 recognized that it is not always feasible or practical to reduce or minimise these emissions.</p> <p>Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases,</p>	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	Yes	An assessment of identified polluting activities is being conducted and monitored. These include gaseous emissions, particulate / soot emissions, effluent discharge and the scheduled wastes and domestic wastes. 'Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution – is in place and is being reviewed accordingly.																																																																			
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	Yes	Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them are in place and are being reviewed accordingly. Greenhouse Gaseous – potential sources are identified using 'Carbon Reduction Plan'. Emission sources have been identified from Land Conservation, Fertilizer (mineral) Manufacture & Transport, No fertilizer, Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.																																																																			
	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	<p>The CU is using the RSPO PalmGHG Calculator version 3.0.1 to calculate the GHG emission for the estate and the mill. The data input used in the calculation was using the 2016, and it can be confirmed that the data were accurate.</p> <p>Milling extraction rate:</p> <table border="1"> <tr> <td>OER</td> <td>22.0%</td> </tr> <tr> <td>KER</td> <td>5.00%</td> </tr> </table> <p>Mill emissions</p> <table border="1"> <thead> <tr> <th>Emission sources</th> <th>tCO2e</th> <th>tCO2e/Tffb</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>28000.33</td> <td>0.19</td> </tr> <tr> <td>Fuel consumption</td> <td>58.25</td> <td>0</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>1345.08</td> <td>0.01</td> </tr> <tr> <td>Export of excess electricity to housing & grid</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sale of PKS</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sale of EFB</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>29403.66</td> <td>0.2</td> </tr> </tbody> </table> <p>Estate emissions and sinks</p> <table border="1"> <thead> <tr> <th>Emission sources</th> <th>tCO2e</th> <th>tCO2e/ha</th> <th>tCO2e/tFFB</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>67362.1</td> <td>9.45</td> <td>0.53</td> </tr> <tr> <td>CO2 Emissions from Fertiliser</td> <td>7239.24</td> <td>0.97</td> <td>0.05</td> </tr> <tr> <td>N2O Emissions</td> <td>6515.05</td> <td>0.8</td> <td>0.04</td> </tr> <tr> <td>Fuel Consumption</td> <td>912.59</td> <td>0.14</td> <td>0.01</td> </tr> <tr> <td>Peat Oxidation</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sinks</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Crop Sequestration</td> <td>-66113.52</td> <td>-9.17</td> <td>-0.51</td> </tr> <tr> <td>Sequestration in Conservation Area</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>15915.46</td> <td>2.18</td> <td>0.12</td> </tr> </tbody> </table>	OER	22.0%	KER	5.00%	Emission sources	tCO2e	tCO2e/Tffb	POME	28000.33	0.19	Fuel consumption	58.25	0	Grid electricity utilisation	1345.08	0.01	Export of excess electricity to housing & grid	0	0	Sale of PKS	0	0	Sale of EFB	0	0	Total	29403.66	0.2	Emission sources	tCO2e	tCO2e/ha	tCO2e/tFFB	Land Conversion	67362.1	9.45	0.53	CO2 Emissions from Fertiliser	7239.24	0.97	0.05	N2O Emissions	6515.05	0.8	0.04	Fuel Consumption	912.59	0.14	0.01	Peat Oxidation	0	0	0	Sinks				Crop Sequestration	-66113.52	-9.17	-0.51	Sequestration in Conservation Area	0	0	0	Total	15915.46	2.18
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are developed, implemented and monitored.			The final emissions value per product	
			CPO	1.19 tCO ₂ e/TCPO
			PK	1.19 tCO ₂ e/TPK

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	Yes	A Social Impact Assessment (SIA) for SOU 5 – Seri Intan unit had been conducted by the PSQM Department of SDPB and SIA report presented to the auditor. The main report included reports for each estate within the Seri Intan CU with the POM included.
	6.1.2	Yes	There was evidence that the SIA assessment had been done with the participation of stakeholders, as recorded in the SIA report, including pertaining social impact related to conversion from guava crop to oil palm crop, and attendance sheets of the meetings. Interviewed stakeholders at Seri Intan POM and Estate, Sungei Wangi Estate and Sabrang Estate confirmed that they were consulted during the SIA exercise, including pertaining social impact related to conversion from guava crop to oil palm crop.
	6.1.3	Yes	During the Audit, all operating units had established and implemented SIA Action plans to avoid or mitigate the negative impacts and promotion of the positive ones, and monitoring of impacts identified in consultation with the affected parties. The documented plans contained time-table and responsibilities for implementation by each operating unit.
	6.1.4	Yes	The SIA Action Plans for all units in Seri Intan CU were reviewed once a year, with participation with the affected parties. Also noted that are issues raised by employees, which actions has or on-going implemented by management. However, communication and recording needs improvement to ensure employees are aware concerning improvement of living condition and surrounding, more overtime requests, leave on gazetted “State holidays”, delay in salary payment, late submission of employees EPF deductions, etc., which actions had been and on-going implemented.
	6.1.5	NA	There are no smallholder schemes included in Seri Intan CU.
C 6.2	6.2.1	Yes	Consultation and communication procedures established by HQ were maintained by operating units in the CU.

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There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties		procedures shall be documented. Major Compliance		An example was the “Procedure for External Communication” in the Mill Quality Management System sighted at Seri Intan POM. Another example was the procedure titled “ Carta Aliran Pengendalian Isu Sosial” sighted by the auditor at Seri Intan POM and Sabrang Estate. The procedures also available at all operating units.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	Yes	Observed the CU maintained appointed respective Assistant Manager at each operating unit as management officials for responsible of social issues, as per existing appointment letter issues on 1/7/16. E.g., of the Assistant Managers (Syed Muhammad Farham –Mill; Iktram Mohd Safian – Sabrang; Konchom Pundiah – Seri Intan; Muhammad Azlan Mohd Nawi - Sogomana).
	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	A list of stakeholders and records of communication were made and maintained by each operating unit. They included relevant confirmation of receipt and efforts made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders of each units. The list of Stakeholders 2018/2019 for Sungai Wangi Estate was sighted. It included contractors, vendors, local community heads, 1.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	Yes	Seri Intan CU had maintained and acknowledged a system for dealing with complaints and grievances, open to all affected parties, in resolving disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle blowers, where requested. There were no letters of complaints from the local communities as well as sighted minutes of Stakeholders meeting between the CU and stakeholders on 7 th December 2018 showed there was no dispute between local communities and other stakeholders and the CU.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	Yes	Available records (minutes of stakeholders’ meetings, letter of complaints etc) showed no dispute between community’s leaders of local villages with the CU.
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	The CU had established and maintained its documented procedures for identifying legal and customary right and for identifying people entitled to compensation, which covered either by Procedures for Handling Boundaries Dispute or Procedures for Handling Squatters Dispute or Procedures for Handling Social Disputes (SPMS), depending on type of issues and stakeholders. The procedure maintained as documented in “Sustainable Plantation Management System, Appendix 3, Flowchart and Procedure on Handling Land Disputes, Version 1, 1/11/08.” The SOPs were available at all operating units visited.
	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	Yes	The CU maintained its documented procedures for calculating and distributing fair compensation, which covered either by Procedures for Handling Boundaries Dispute or Procedures for Handling Squatters Dispute or Procedures for Handling Social Disputes, depending on type of issues and stakeholders. According to the procedure, the calculation and distribution of compensation to be carried out at the company level, i.e. not at the estate/mill level. The CU had established and maintained its documented procedures for calculating and distributing fair compensation, which covered either by Procedures for Handling Boundaries Dispute or Procedures for Handling Squatters Dispute or Procedures for Handling Social Disputes, depending on type of issues and stakeholders.

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		land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	Yes	Records sighted (minutes of stakeholders' meetings, letter of complaints etc) showed there were no negotiated agreements and compensation claims within the covered audit period. No issues pertaining to this matter were raised by community's leaders based on the records.
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	Yes	Documentation of pay and conditions were available and provided in the employment contract documents of workers i.e. offer / acceptance letter or Employment Contract and pay slip. Detail in the employment documents included salary, working hour, accommodation, medical, transport, equipment, etc. Separately, pay slip indicated worker's earning, salary deduction and resulting nett pay.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	Yes	The CU observed maintained to provide detail of condition of employment in compliance to laws and agreement in its employment documents, as well as to provide explanation to its employees. Sighted were offer of employment letters to local and foreign workers at Seri Intan Estate and POM, Sungei Wangi Estate and Sabrang Estate operating units during the audit provided details of condition of employment in compliance to laws and agreement as well as to providing explanation to the employees evidenced by the letters of employment for the local and foreign workers. The wages stated in their employment contract for the following workers at Seri Intan Estate sighted were based on NUPW Collective Agreement. Reviewed pay slip for month Sept, Oct and Nov 2018 found wages in their payslips were calculated based on daily rate and above minimum wages requirements.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible (not applicable to smallholders). Minor Compliance	Yes	Seri Intan CU continues to provide free housing, water supply, free medical services, subsidized electricity and access to education for children of both local and foreign workers. Other amenities and facilities provided include clinic, ambulance, <i>surau</i> , groceries shops etc. Subsidized rice scheme was also continued by the CU management for the welfare of the workers. Weekly inspection of the linesite was conducted by the CU. Record of the inspection was available. A book was also available for workers to record their request for maintenance of the living quarters. Linesite maintenance request book for Seri Intan POM and Sungei Wangi Estate were verified. The book had entries which included worker's name, house no, description of complaint, inspection date and actions taken by management.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food.	NO	Seri Intan CU had taken demonstrable effort to monitor and where able, improve workers' access to adequate, sufficient and affordable food. There were groceries shops in the CU that sell sundries including food items for the need of CU communities. However, consultation with workers and Union representatives at Seri Intan Estate found that prices at the unit's grocery shop were not monitored. Evidence found during auditor's visit to the shop was, there was no price list for controlled items food items displayed. A Minor NCR (KN 01/18) was

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		Minor Compliance		therefore, raised against Indicator 6.5.4.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	Yes	The CU maintained its published statements on freedom of association and respect the right of workers to form or join trade unions. The freedom of association statement incorporated in the company Social Policy (dated January 2015) statement together with other policy statements were maintained and sighted on notice boards in the estate and mill.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	Yes	Minutes of meetings with main trade unions or workers representatives were documented at all operating units. Sighted minutes of meetings between CU management's representatives and trade union and workers available.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	Yes	Inspection of the employees register (local and foreign) of Seri Intan CU and its contractors followed by sampling of employee salary payment slips found that all company and contractors' employees were above minimum age (18 years). This was also affirmed by administration staff and workers interviewed.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	Yes	The "freedom of association" statement was documented and incorporated in the company "Social and Humanity Management" Policy statement together with other policy statements were available, retained and sighted on notice boards at the estates and palm oil mill.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	Yes	Interviewed employees of different gender, nationality, race, religion acknowledged that they were treated equal and not discriminated against on any form related to recruitment, works, promotion, amenities, benefits, etc. Interviewed external stakeholders (suppliers, contractor) of Seri Intan CU, also acknowledged that they had no issues pertaining equal business opportunities. They acknowledged that payments were prompt. Stakeholders' meeting minutes also showed community's leaders of local villages (i.e. Kg. Sg. Kerang, Kg. Sg. Rubana and Kg. Sg. Durian) had no issue on discrimination.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	Yes	Recruitment and promotion noted were conducted based on job requirements (skills, capabilities, qualities, and medical fitness) accordingly. Interviewed local and foreign employees acknowledged no issues pertaining recruitment and promotion.
C 6.9	6.9.1	A policy to prevent sexual and	Yes	A policy to prevent sexual and all other forms of harassment and violence was available with the statement

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There is no harassment or abuse in the work place, and reproductive rights are protected.		all other forms of harassment and violence shall be impl. and communicated to all levels of the workforce. Major Compliance		incorporated into the company Social Policy and Social & Humanity Management Policy statements. The statements together with other policy statements were displayed and sighted on notice boards at the estate and palm oil mill.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	Yes	A policy to protect the reproductive rights of all, especially of women was available with the statement incorporated into the company Social Policy and Social & Humanity Management Policy statement dated January 2015. The statements together with other policy statements were displayed and sighted on notice boards at the estate and palm oil mill. Interviewed female workers (e.g. Bombee Munijan, Salsanew a/p Darman, Nazatul, Dani, Karyamah, Logeshvari a/p Rathakrishnan and Kaliammal a/p Subramaniam) acknowledge their understanding of the policy and their rights, e.g. no work of handling chemicals during pregnancy or breastfeeding.) acknowledge their understanding of the policy and their rights, e.g. no work of handling chemicals during pregnancy or breastfeeding.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and comm. to all levels of the workforce. Minor Compliance	Yes	The CU had established and retained a specific grievance mechanism which respect to anonymity and protection of complainants where requested. It is implemented in the GPA (Group Policies and Authorities) No. B5-Whistleblowing. However, there were no cases of complaint or grievance found during the audit, as observed from interview of workers and minutes of stakeholder meetings.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	Yes	Not applicable as the CU only received its own certified FFB.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be doc (where these are under the control of the mill or plantation). Major Compliance	Yes	Seri Intan Mill only received its own group certified FFB. For other services, SOU 5 maintained its procurement process either through quotation and order or tendering process.
	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	Interviewed suppliers and contractors at Seri Intan CU acknowledged that the estates / mill had treated them fairly and they have no issues with the estates or mill management. They acknowledged that their contract were fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	Yes	Interviewed suppliers and contractors and review of the invoices and related payment documentation showed that payment to suppliers/contractors were made in a prompt and timely manner through bank transfer upon submission of complete claim documents via MEX system. No complaint from supplier/contractor was observed.
C 6.11 Growers and millers contribute to local	6.11.1	Contributions to local development that are based on the results of consultation with	Yes	The CU continued contributed to local communities. This included: <ul style="list-style-type: none"> • repair of main road in SJKT Nova Scotia as requested by school. • repair of Kg. Glouster road as requested by local community.

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Sustainable development where appropriate.		local communities shall be demonstrated. Minor Compliance		<ul style="list-style-type: none"> • work and job opportunities offered to local community • donation to schools
	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	Not applicable as there are no scheme smallholders in the 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	Interviewed employees (local and foreign) including women, acknowledged that there were no cases of forced or trafficked labour at Seri Intan CU. They were treated accordingly as per employment conditions, employment acts and regulations. Such documented consent signed was made available by the CU. Review of employee's wage, records of work, and conditions of employment also observed no cases of forced or trafficked labour.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	Yes	No contract substitution was observed. Foreign workers interviewed confirmed they had employed direct by the CU and had no other contract with other party, and treated as per contract signed with Sime Darby.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	Yes	Seri Intan CU labour policy statement which is relevant to both local and foreign workers was contained in the Social Policy and Humanity Management Policies. The labour requires that all foreign workers hired to attend a one-week post-arrival orientation course, <i>Kursus Induksi untuk Pekerja Asing</i> (Induction Course for Foreign Workers) before commencing work. Through this course, the workers were exposed among other things to various relevant laws of the country (such as labour and immigration laws), health and safety, work contract, sourcing process of foreign workers and language and cultures of Malaysia.
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	The SDPB Social Policy and Social & Humanity Management Policies have included statement on freedom of association. The policies noted displayed at the notice boards at the estates and mill.
	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	NA	This indicator is not applicable since the Seri Intan CU is located in Peninsular Malaysia.

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Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Clause	Indicators		Comply Yes/No	Findings
C 7.1 A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.	7.1.1	An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented. Major Compliance	Yes	Records at Sungei Wangi estate sighted showed there was new planting at the CU. An SEIA was undertaken by the PSQM Department of SDPB on 16/12/2016. The SEIA covered the aspects of boundary control, water resources, river protection, soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic, solid and biomass) and air quality control. The area 200.90Ha was planted in 2017.
	7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. Minor Compliance	Yes	Appropriate strategies and prescriptions was outlined in the SEIA and implemented at Sungai Wangi unit to avoid or mitigate identified potential negative impacts of the new planting found in the SEIA. Operational procedures were plan in the estate budget and work program. As for workers affected by the crop conversion (new planting) exercise, the management decision taken was rehiring, redeployment and voluntary retrenchment.
	7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. Minor Compliance	Yes	The new planting only involved the CU's own land and former employees related to guava operation. There were no outgrowers involved in this new planting area. Thus, there was no applicable impact to outgrowers.
C 7.2 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations	7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. Major Compliance	Yes	The long-term suitability of land for oil palm cultivation was taken into account in plans and operations. As per the soil map, the soil series in the new planting area was of Sitiawan series. This series was suitable for long term oil palm cultivation.
	7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. Minor Compliance	Yes	There was sufficient topographic information to guide the planning of drainage and irrigation systems, roads and other infrastructures. The visit to this areas confirmed that the area was completely flat with sufficient roads and drains.
C 7.3 New plantings since November 2005 have	7.3.1	There shall be evidence that no new plantings have replaced primary forest, or any area	Yes	There was no evidence of the new planting had replaced primary forest or any area required to maintain or enhance HCV since Nov 2005. This was affirmed through the Land Use Change (LUC) Analysis exercise as reported in the "Carbon Stock & LUC Analysis Report for SOU 5 Sg Wangi Estate" dated March 2017. The LUC

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not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values		required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2). Major Compliance		analysis was based on satellite images comparison between years 1998, 2005, 2011 and 2015. From earlier maps of the estate, it was verified that this new planting area was previously totally planted with Guava The report "Internal Social Impact & Environmental Impact Assessment (SEIA) SOU 5, Sg Wangi estate" 2016 also confirmed there was no HCV areas within the affected area as per reported in the "HCV Re-assessment Report for SOU 5 Seri Intan/Selaba, Dec 2015".
	7.3.2	A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status. Major Compliance	Yes	A comprehensive HCV assessment, including stakeholder consultation, was conducted and reported in the Land Use Change (LUC) Analysis exercise reported in "Carbon Stock & LUC Analysis Report for SOU 5 Sg Wangi Estate" dated March 2017. The LUC analysis which was based on satellite images comparison between years 1998, 2005, 2011 and 2015 showed vegetation changes since 2015. There was no HCV change.
	7.3.3	Dates of land preparation and commencement shall be recorded. Minor Compliance	Yes	The Estate had programmed all work operations required from land preparation to planting and had complied to its program. Records showed that land preparation commenced in July 2017.
	7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2). Major Compliance	Yes	The new planting only involve CU own land, which was planted for guava crop. Thus, there was no replacement of primary forest or any area required to maintain or enhance one or more High Conservation Values (HCVs).
	7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2). Minor Compliance	Yes	The new planting only involved CU own land and own employees, It did not involve external parties. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise. Plan to mitigate potential negative social impacts onto former employees had been appropriately implemented.

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<p>C 7.4 Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p>	7.4.1	<p>Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation. Minor Compliance</p>	Yes	<p>Soil maps provided showed that there were no marginal and fragile soils in this area. It was also verified by visit to the area during the audit that there was no marginal or fragile soils. The visit to the area also confirmed that the area was totally flat and not 300m above sea level.</p>
	7.4.2	<p>Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts. Major Compliance</p>	Yes	<p>NA. Soil maps provided showed that there were no marginal and fragile soils in this area. It was also verified by visit to the area during the audit that there was no marginal or fragile soils.</p>
<p>C 7.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	7.5.1	<p>Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed by these local peoples. Major Compliance</p>	Yes	<p>The new planting only involved CU own land, It did not involve local peoples' land or rights. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise.</p>
<p>C 7.6 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any</p>	7.6.1	<p>Documented identification and assessment of demonstrable legal, customary and user rights shall be available. Major Compliance</p>	Yes	<p>The new planting only involved CU own land, It did not involve local peoples' land or rights. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise.</p>
	7.6.2	<p>A system for identifying people entitled to compensation shall</p>	Yes	<p>The new planting only involved CU own land, It did not involve local peoples' land or rights. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU</p>

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agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.		be in place. Major Compliance		were affected by the new planting exercise.
	7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. Major Compliance	Yes	The new planting only involved CU own land, It did not involve local peoples' land or rights. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise.
	7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. Minor Compliance	Yes	The new planting only involved CU own land, It did not involve local peoples' land or rights. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise.
	7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available. Minor Compliance	Yes	The new planting only involved CU own land, It did not involve local peoples' land or rights. As such, there were no compensation claims. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise.
	7.6.6	Evidence shall be available that the company has made adequate efforts to enable affected communities and rights holders to have access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. Minor Compliance	Yes	The new planting only involved CU own land, It did not involve local peoples' land or rights. Review of stakeholders meeting minutes and feedbacks showed that no local communities neighbouring Seri Intan CU were affected by the new planting exercise.
C 7.7 No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.	7.7.1	There shall be no land preparation by burning, other than in specific situations, as identified in the ' <i>Guidelines for the Implementation of the ASEAN Policy on Zero Burning</i> ' 2003, or comparable guidelines in other regions. Major Compliance	Yes	SDPB policy on no open burning is reflected in the EQMS-SOP-Section B2 - Under felling/clearing & land preparation and Carbon Policy. The estate practiced zero burning during land clearing of the previous Guava trees. During the visit to replant areas, it was evident that all guava were felled and shredded.
	7.7.2	In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in ' <i>Guidelines for the</i>	Yes	There was no requirement to use fire for land preparation as the previous crop being Guava and did not have any disease

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		<i>Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. Minor Compliance</i>		
C 7.8 <i>Preamble</i> New plantation developments are designed to minimize net greenhouse gas emissions.	7.8.1	The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. Major Compliance	No	A Land Use Change (LUC) Analysis was conducted relevant to the new planting exercise and reported in the "Carbon Stock & LUC Analysis Report for SOU 5 Sg Wangi Estate" dated March 2017. The LUC analysis was based on satellite images comparison between years 1998, 2005, 2011 and 2015. The LUC analysis report was sighted. However, the major potential sources of emissions that may result directly from the development was not evidently identified and estimated. On Sungai Wangi Estate (new planting area) there was no record to demonstrate the above requirement had been fulfilled. Thus, the Major NCR RA 02 2018 was issued.
	7.8.2	There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options. Minor Compliance	Yes	Based on the calculation reported in the Carbon Stock & LUC Analysis Report (March 2017), it showed that the net GHG emission resulting conversion from guava to oil palm is higher in carbon stocks.

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		
	a)	Reduction in use of pesticides(Criterion 4.6);	Yes

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	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	Yes	Seri Intan 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 is being monitored by the relevant appointed personnel.
	c)	Waste reduction (Criterion 5.3);	Yes	Seri Intan CU has continued to implement waste management plan related to waste i.e. scheduled wastes, operational wastes and domestic wastes. Operational waste such as fibre, shell were reuse for boiler fuel , while domestic waste were collected by the local authority and disposed to designated dumping area. Good housekeeping was observed and store were locked.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	Yes	Pollution and GHG emission were monitored. Record of monitoring were available and base on the data collected show emission was reduce and pollution were manageable.
	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 optimising the yield of the supply base	Yes	As Seri Intan CU is part of a well-established organization, Sime Darby Plantations Berhad, the yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts had been done to optimize, the yield of the plantation such as maximising crop recovery, optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), the soil fertility were 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	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Indonesia PT Mitral Austral Sejahtera PT MAS undergone RSPO Main Assessment in July 2011.The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress regular basis since November 2012. The latest progress report submitted to RPSO dated 8 Sept 2017. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat. As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review.

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			<p>https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</p> <p>PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P900001OioYJEAZ</p> <p>PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing.</p> <p>As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p>PT Bersama Sejahtera Sakti The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p>PT Ladang Rumpun Subu Rubadi SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina Sungai Jernih Estate and the KKPA Estates has undergone audit.</p> <p>PT Sime Indo Agro Only East estate not yet certified – land legalization still in progress.</p> <p>Liberia SDP has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of</p>
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				<p>Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p> <p><u>Papua New Guinea (NBPOL)</u> Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82</p>
	(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	Time bound plan was verified by CB and it can be confirmed that there were no changes to the current time bound plan as verified during this audit.
	(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	There were no changes to the current time bound plan as verified during this audit.
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	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation

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	comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82								
(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	Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there were two groups of communities: The TKPP (7 of 9 villages) and the Kerunang & Entapang team (2 of 9 villages). 21 TKPP meetings have been conducted. The most recent one was held on 2/11/2016. Issues related to the 14 demands made by TKPP were closed except for two As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail								
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;		Based on the internal audit report, there were no labour dispute that are not being resolved through an agreed process for all uncertified units for all 8 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at December 2017.								
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal and external audit (ISPO certified) there was no labour disputed recorded at the CU.								
(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:	YES	SDP PT Mitral Austral Sejahtera already ISPO certified by MUTU Certification International on 30/11/2017 and there was no issue on legal non-compliance for all uncertified unit.								
	<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; 		<table border="1"> <thead> <tr> <th>#</th> <th>Name of SOU</th> <th>Name of Units</th> <th>Positive assurance statement and self-assessment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PT Sime Indo Agro</td> <td>East Sei Mawang</td> <td>Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor</td> </tr> </tbody> </table>	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor
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	<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.																					

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		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.
		<ul style="list-style-type: none"> 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	Further information can be obtained from https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail
4.6.4	The CB shall review whether oil palm 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.	No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, Sabrang Estate was a freehold and the ownership was under SDPSB. As for Seri Intan, Sungai Wangi and Sogomana, some of the land titles of these 3 estates were still the transfer process, between the previous owners; Golden Hope to Sime Darby. Copy of the letter addressed to the Lembaga Tanah Ladang, Negeri Perak, pertaining to the application for transfer of land ownership from Golden Hope Plantations Sdn Bhd to Sime Darby Plantation Sdn Bhd was sighted. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in Seri Intan.

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.

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ATTACHMENT 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 1.1.2	Major	<p>#NCR No : RA 01 2018 Finding: Records of requests for information regarding RSPO certified area was found incorrect.</p> <p>Objective Evidence: The information given to CB regarding RSPO certified area for SOU 5 Seri Intan was incorrect . i.e. Data provided for Annual Surveillance Audit (ASA) 2017 and ASA 2018 . ASA 2018 certified area given those not reflect the record provided at the time of audit.</p>	<p>Corrective Action:</p> <p>After deliberation and consultation with Land Dept., HQ and Managers, the total actual certified areas will be based on the land Dept. HQ latest net land title areas as at Match 2019 for the respective CUs for accurate and standard reporting.</p>	<p>Auditor Verification:</p> <p>Minutes of the Meeting, "SOU 5 for closure of NCR" held on 15.03.2019 and attended by 3 Senior Managers sighted and summary of Land Titles to confirm total certified Ha verified.</p> <p>Status: Closed</p>
Indicator 4.7.3	Major	<p>#NCR No : STK 01 2018 Finding: 1. Not all appropriate protective equipment was used by workers at the place of work. 2. Vehicles were not maintained as per SOP 'Transportation System & machinery Safety, OSH procedure Doc: SD/SDP/PEQM(ESH)/201/0517</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> 4. Seri Intan Estate; Worker applying fertilisers for cover crop in the 2018A replant were not using the appropriate PPE. 5. Seri Intan Estate: Tractor TF014 – 2 bolt and nuts each were missing from the left rear and front wheels and diesel and hydraulic oil were leaking. 6. Sabrang Estate – Tractor TF018 diesel and hydraulic oil were leaking. 	<p>Corrective Action:</p> <p>Management had conducted</p> <ol style="list-style-type: none"> 1 Training on 2nd March 2019 for workers who apply fertilisers on use of PPE and 2. Training on Tractor Safety Driver conducted on 13.10.2018 	<p>Auditor Verification:</p> <ol style="list-style-type: none"> 1. Evidence of Refresher Training for workers who apply fertilisers (Manuring Gang) was conducted by the Estate Assistant Manager on 02.03.2019 on Seri Intan Estate. Attendance lists and photographs have been received. The training covered the use of various type of PPE and the importance in using them. 2. Evidence of Refresher Training "Tractor Safety Driver" conducted on 13.10.2018 received. Attendance lists, photographs have been received. <p>Photographs of tractor wheels, etc after repairs have also been provided.</p> <p>Status: Closed</p>

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Indicator 5.3.3	Minor	<p>#NCR No : RA 03 2018 Finding: A waste management plan for empty chemical container was not implemented i.e. triple rinse & punctured.</p> <p>Objective Evidence: Seri Intan Estate: There are used chemical containers with residue inside which not triple rinse & punctured as per management plan.</p>	<p>Estate Management would conduct awareness training. to respective workers to conduct triple rinse and punctured as per management plan. A training 7/1/19 had been conducted on</p>	<p>Corrective action accepted.</p> <p>Verification of implementation will be verified during the next audit.</p> <p>Status: Open</p>
Indicator 6.5.4	Minor	<p>#NCR No : KN 01 2018 Finding: An effort to monitor and where able, improve workers' access to adequate, sufficient and affordable food were not sufficient.</p> <p>Objective evidence: Consultations with workers and Union representative at Seri Intan Estate found the prices in groceries shops at Sri Intan Estate were not monitored. Visit to the shops found no controlled items price list or any demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food by the CU.</p>	<p>Sundry shop would prepare a price list and will sent the list on a quarterly basis to the estate for monitoring purposes.</p>	<p>Corrective action accepted.</p> <p>Verification of implementation will be verified during the next audit.</p> <p>Status: Open</p>
Indicator 7.8.1	Major	<p>#NCR No : RA 02 2018 Findings: The major potential sources of emissions that may result directly from the development was not evidently identified and estimated.</p> <p>Objective evidence: Sg Wangi Estate (new planting area): No record to demonstrate the above requirement has been fulfilled.</p>	<p>To add addendum to the report on the identified and estimated major potential sources of emission for the affected area.</p>	<p>The following documents were reviewed and accepted.</p> <ol style="list-style-type: none"> 1. Carbon Emission Report for Sg Wangi Estate 2. Carbon Stock Report for Sg Wangi Estate 3. New Development of GHG Calculator 4. SEIA Report for Sg Wangi Estate <p>Status: Closed</p>

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Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

SECTION A : GENERAL INFORMATION

1. File Reference No.	: ES10170013
2. Name of facility/ site(s) /entity(ies)	: Sime Darby Plantation Berhad – SOU 5 Seri Intan
3. Site Location (single site/multisite/Group)	: Kilang Kelapa Sawit Seri Intan, 36009 Teluk Intan, Perak
4. SC model	: Identity Preserved (IP)
5. Type of entity	: CPO Mill
6. RSPO Member Number	: 1-0008-04-000-00
7. Annual summary records of certified oil palm products purchased and claimed	: Refer Table 4 of this report

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.	Not Applicable
	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 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.	The organizational systems, the management systems and the operational systems, including any documented policies and procedures of Seri Intan Palm Oil Mill (hereafter refer as SIPOM) are sufficient and adequate in complying with latest revision of RSPO Supply Chain Certification Standard. Changes are as followed; New Mill Manager (report duty on 17/12/18) Management system – Sustainable Plantation Management System (an internal system), no longer ISO 9001 certified, only RSPO certified Operational system – no changes since last audit Policy update – 14 policies remain, SCCS document updated accordingly based on new standard requirements. Main reference document – Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability (version 2, issue 4 dated September 2018) under the Sustainable Plantation Management System

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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.	Seri Intan Palm Oil Mill (hereafter refer as SIPOM) takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at location as mentioned above.
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
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 IT Platform details; Member name: Seri Intan Oil Mill License ID: CB66473 Member country: Malaysia Member category: Oil mill Core product: Palm oil License validity: 05/03/18 – 03/02/19
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable
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.	SIPOM obtained supply of certified fresh fruit bunches (FFB) from own certified supply base (as listed below). List of certified supply base; - Seri Intan Estate - Sabrang Estate - Sungai Wangi Estate - Sogomana Estate - Bikam Estate - Cluny (divert crop) - Kinta Kellas (divert crop, certified by BSI, cert. no. RSPO 550180)
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	SIPOM 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 - CPO Mills: Identity Preserved.
3	Documented procedures	

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3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	-
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	SIPOM had revised their reference document - Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability (version 2, issue 4 dated September 2018 under the Sustainable Plantation Management System.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Among record sighted are as followed and found that they are in compliance with the standard requirements; FFB delivery/ consignment note, WB advice ticket, FFB grading, Daily FFB received etc
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.	Based on appointment letter dated July 2016, Mr. Syed Muhammad Farhan (Assistant Manager) was appointed as Person-in-charge of Environmental/ Quality Management System (including RSPO) on site and remain as the PIC for RSPO, assisted by weighbridge Operators and other defined critical control point (CCP) personnel (i.e. auxiliary police, FFB grader (ramp), QA, lab and production personnel). Based on interview during the audit, PIC was able to demonstrate awareness on the standard requirement as well as SIPOM own internal procedures.
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>	<p>As describe under para 17.0, SIPOM refer to Internal Audit Procedure (SD/SDP/PSQM/IAP). Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>Coverage of audit was found sufficient and inclusive of the new standard (including modular requirement – Module D CPO Mills: IP). Internal audit conducted in November 2018.</p> <p>4 major non- conformances were during the audit. The NCs has been acted on & verified adequate by internal auditor.</p>
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; 	Available and verified.

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	<ul style="list-style-type: none"> • 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 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).	To demonstrate that purchases are made to the material category agreed with their supplier, SIPOM ensure consignment note from supplying estates being marked/ stamped accordingly to indicate the RSPO certified status.
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.	For certified CPO & PK produced, SIPOM through Global Trade Marketing (GTM) update their stock in Palm Trace system.
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 announcements.	SIPOM only receive supply of certified FFB from internal supplier which is under the same certification – found the certificate still within validity period.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Refer para 10.0 non- conforming products and/ or documents of Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability which has described adequate mechanism for handling of non-conforming material and/or documents. No non-conforming material and/or documents recorded since last audit.
5	Outsourcing activities –	

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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>	SIPOM outsource transportation of certified product (CPO only) to end buyer.
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ul style="list-style-type: none"> a) The site has legal ownership of all input material to be included in outsourced processes; 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. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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. 	These standard requirements were listed under para 3 of the agreement – Sustainability & Traceability of Product (Annexure 5).
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	Not Applicable
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.	Not Applicable
6	Sales and goods out	
6.1	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	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.

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	<p>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. 	
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>Global Trade Marketing (GTM) personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer.</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 FY 2018/ 2019 had been established & being reviewed accordingly by the Mill Management. The relevant training records were well maintained.</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.</p> <p>Training shall be specific and relevant to the task(s) performed.</p>	<p>Last training conducted in Nov 2018 by GSQM. Training focus on relevant IP procedures and record. Training material was found to be adequate in addressing the standard requirements. Participant consist of Mill Engineers handling SCCS, mill weighbridge operators, administrative staff handling purchase and sales contracts, auxiliary police handling incoming and outgoing as well as other relevant member of staff.</p>

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9	Record keeping	
9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	The relevant record pertaining to RSPO SCCS within SIPOM found to be updated accordingly and easily accessible during the audit.
9.2	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.	Relevant record pertaining to implementation of RSPO SCCS within SIPOM retained for minimum of 2 years.
9.3	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.	Available and verified.
10	Conversion factors	
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).	SIPOM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
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 Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. SIPOM has not use RSPO corporate logo as well as trademark logo.
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Refer Procedure for External Communication in PQMS SOM Sub- section 5.5 Appendix 5.5.3.2. No complaint received from stakeholder with regards to RSPO SCCS since last audit.
13	Management review	
13.1	The organization is required to hold management reviews at	Management review (MR) at SIPOM planned for once annually.

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	planned intervals appropriate to the scale and nature of the activities undertaken.	Last MR conducted on 22 nd November 2018
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	Management review meeting minute had been established. Coverage of review meeting was found sufficient.

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RSPO Supply Chain at the palm oil mill - Identity Preserved Model – Module D

SECTION C : SUPPLY CHAIN MODELS (to only use whichever is applicable)

Module D – CPO Mills: Identity Preserved		
D.1	Definition A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material, then only Module E is applicable. To verify: a) the volume of certified and uncertified FFB entering the mill b) the volume sales of RSPO certified The claim only the volume of oil palm products produced from processing of the certified FFB as MB	Reviewed and verified.
D.1.1		
D.2	Explanation Estimate total tonnage of CPO and PK potentially produce in a year	Provided.
D.2.1		
D.2	Explanation The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.
D.2.2		
D.3	Documented procedures	
D.3.1	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	a) Refer to Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability

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	<p>implementation of all the elements in these requirements;</p> <p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p> <p>This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>(version 2, issue 4 dated September 2018) under the Sustainable Plantation Management System. Details as described under para 3.1a of Supply Chain part of the report/ checklist.</p> <p>b) The Assistant Engineer remained as the person with overall responsibility for the implementation of the supply chain requirements, whereas Mill Manager has the overall authority over the system. Based on interview during the audit, the PIC was able to demonstrate awareness on the standard requirement as well as SIPOM own internal procedures.</p>
D.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Reference - Para 7.0 of Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability has described how SIPOM manages the FFB from certified source. It was confirmed that no non-certified FFB was received by SIPOM.
D.4	Purchasing and goods in	
D.4.1	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	<p>SIPOM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Seri Intan Estate, Sabrang Estate, Sungai Wangi Estate, Sogomana Estate and Bikam Estate. Monitoring records titled as "RSPO Records for Oil Mills" has recorded the tonnage of certified FFB and other relevant process details.</p> <p>Verified through SIPOM weighing system called 'SimeWeigh' and random sample of weighbridge ticket from above mentioned estates that required information as listed by the standard as well as their own procedures are adequately presented.</p> <p>Refer para 4 of Supply Chain part of the report/ checklist.</p>
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction of certified CSPO during the period under review (Jan 2018 – Dec 2018).
D.5	Record keeping	
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	SIPOM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as "RSPO Records for Oil Mills Year 2017 and Year 2018".
D.6	Processing	
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 non-certified oil palm product including during transport and storage.	<p>Global Trading & Marketing (GTM) office informed SIPOM by e-mail on the dispatch of RSPO certified CPO/ PK to relevant buyer. The dispatch of the RSPO certified CPO/ PK to buyer by SIPOM were made based on a specific contract.</p> <p>The receiving pit, pipelines and tanks in SIPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO produced.</p>

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		For traceability of a specific batch of RSPO certified CPO back to the supplying POM, SIPOM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization issued by their site.
	The objective is for 100 % segregated material to be reached.	SIPOM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket and interview with weighbridge operator. Therefore, CPO and PK can be considered 100% segregated.

	Module E – CPO Mills: Mass Balance – Not Applicable	
	Annex 1 – Supply Chain Yield Schemes – Not Applicable	
	Annex 2 – Book & Claim (BC) – Not Applicable	
	Annex 3 – RSPO Rules on Communications and Claims – Refer Para 11 of Supply Chain part of the checklist/ report	

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Attachment 6

Status of Non-conformities Previously Identified

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 RA 01 2017	Major	<p><u>Objective evidence:</u> Seri Intan Mill – site visit was observed the following</p> <ol style="list-style-type: none"> 1) Empty lubricant oil drums were located beside monsoon drain , no secondary containment and no sheltered 2) A few empty containers of spent chemical with missing cap 3) Wrong hazard signage for liquid wastes 4) No identification of waste code, waste name on several scheduled waste containers 5) Spill kit not readily available to response if there are any emergency situation 6) Chemical store (calcium carbonate) – no CSDS available at point of use, poor storage condition <p>Seri Intan estate- Site was observed</p> <ol style="list-style-type: none"> 1) wet flooring at schedule waste store 2) Waste labelling 3) Storage condition – hornest nest 4) five empty lubricant containers use to store water at line site <p>Sabrang Estate</p> <ol style="list-style-type: none"> 1) storage chemical at water treatment plant store - no secondary containment. 	<ol style="list-style-type: none"> 1) All empty containers already being removed to secure place before waste being disposed. 2) Missing caps will be replaced before being disposed. 3) Wrong hazard signage will be replaced before being disposed. 4) Training will be conducted to all personnel involve as soon as possible. 5) Spill kit will be made available for emergency situation. 6) CSDS will be made available at near point of use. 	<p><u>Seri Intan Mill</u> Verified records showed that all empty lubricant containers and empty spent containers were disposed to Kualiti Alam Sdn Bhd. Stored empty containers were observed to have their caps appropriate hazard signage were pasted on each container. Spill kits were sighted beside scheduled waste store. Records of safe chemical handling training on 06.03.2018, 22.10.2018 & 23.11.2018 and scheduled waste management training conducted on 23.11.2018 by PQSM officer and attendant list were verified. Calcium carbonate storage area was observed to be need and clean.</p> <p><u>Seri Intan estate</u> Schedule waste store was observed clean and neat with wastes labelled. At linesite no lubricant containers were observed during the visit.</p> <p><u>Sabrang Estate</u> Chemicals were now stored on trays (secondary containment).</p> <p>Status : Closed</p>

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<p>5.6.3 RA 02 2017</p>	<p>Minor</p>	<p><u>Objective evidence:</u> Wrong data input for 2016 GHG calculation such as area statement</p>	<p>To verify all data input in the GHG calculator and resend back the GHG Calculation to RSPO.</p>	<p>The data input used in the calculation was using the 2016, and it was confirmed that the data were accurate. Based on the summary report, the following were determined FFB: 148,798.41 mt, CPO: 32,379.09 mt, PK: 8045.26 mt</p> <p>Status : Closed</p>
<p>4.8.1 RA 03 2017</p>	<p>Major</p>	<p><u>Objective evidence:</u> No evidence of training conducted as follows: 1) Seri Intan Mill and Sabrang Estate: Not all training related to first aid provided to all first aid team 2) Awareness on the scheduled waste to all employee. 3) Understanding on the payslip & wages</p>	<p>Update the training programme and conduct the necessary training as per schedule.</p> <p>First aid training was conducted on 6/3/2018 Safe chemical handling & Scheduled waste management training was conducted on 24/1/2018. Understanding on payslip & wages were conducted in 25/1/2018.</p>	<p>Records of trainings conducted on First Aid on 06.03.2018, Safe chemical handling, waste management on 24.01.2018 and on Payslip understanding on 25.01.2018 were verified</p> <p>Status : Closed</p>
<p>4.7.2 RAR 01 2017</p>	<p>Major</p>	<p><u>Objective evidence:</u> At Sabrang Estate <input type="checkbox"/> Hazard for heat stress management working at replanting nursery, and immature areas was not being identified <input type="checkbox"/> Near miss accident occurred on 17/06/2017 was not reviewed by the OSH committee</p>	<p>Management of CU has instructed OSH officer from PQSM department to provide the training for person in charge / OSH committee team to handle and reporting and to do the HIRARC.</p> <p>The PPE (straw hat, gallon of drinking water, shelter) to prevent heat stress already been given by employer to employees who working in the open space areas such as nursery, immature areas and etc. However, found the awareness in worker is low. CU management has conducted immediately morning briefing and training to their employees</p>	<p>PSQM Department has given training to OSH team and PIC regarding guidelines to conduct HIRARC on 03/01/2018. Members also has reviewed and conducted an assessment to revise the HIRARC regarding heat stress management in open space areas such as nursery, immature areas, and replanting areas. Management also will discuss and review the HIRARC quarterly especially in the OSH meeting.</p> <p>Status : Closed</p>

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<p>4.1.2 RAR 02 2017</p>	<p>Major</p>	<p><u>Objective evidence :</u> (Recurrence issues) At Seri Intan Estate – PPE for frond stacker and harvester i.e. leather hand glove and rubber bot (wellington boots) was observed not in good condition and record of PPE replacement was not available. Seri Intan Mill – water analysis on Oct 2017 exceed limit at sampling point near ramp.</p>	<p>CU management has immediately replaced all broken PPE. The morning briefing and training to their employees during muster call to improve an awareness from employees.</p>	<p>PPE issue records verified showed that PPE in poor conditions had been replaced as and when required. The latest water analysis results at the sampling point near ramp were all within limits</p> <p>Status: Closed</p>
<p>D4.1 MZK 01 2017</p>	<p>Major</p>	<p><u>Objective evidence:</u> Seri Intan POM: Consignment note FFB/Weighbridge Ticket from Certified estate did not consistently contain RSPO certificate Number</p>	<p>The PSQM will liaise with the IT Department to update the system via VNC connection. Estimate to complete on 5 January 2018.</p> <ol style="list-style-type: none"> 1. IT Department will issue the access password to the SQM CER team (limited to update parts certification only). 2. To conduct the SCCS SOP training to the weighbridge operator. 3. To establish the manual stamping and will be using if the SIME WEIGH system having a problem. 	<p>The System had already been repaired, and all latest WB tickets had RSPO Certificate number on them.</p> <p>Status: Closed</p>
<p>4.4.2 MZK 02 2017</p>	<p>Major</p>	<p><u>Objective evidence:</u> Sabrang Estate The following was observed: 1. Field 2010 Rubana Division - traces of chemical activities at Main drain nearing to water gate to main river. Seri Intan Estate The following was observed: 1. Traces of chemical activities at linesite monsoon drain and office compound drain. 2. There is no water sump at tractor wash area, sighted the area that water straight go to the main drain.</p>	<ol style="list-style-type: none"> 1. The management will train the operator immediately and will replace that area with beneficial plant. 2. The management will brief to the linesite people regarding protection of water course and to the workers that watercourse cannot be sprayed. 3. Management will repair the collapse bund, and retrain the tractor driver that area cannot wash tractor. 	<p>During this audit no traces of chemical activity was observed, the water sump had been repaired and there was no evidence to show that tractors were being washed there.</p> <p>Status: Closed</p>

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Attachment 7

**RSPO Certification Timebound Plan for Sime Darby Plantation (SDP)
As at Oct 2018**

MALAYSIA

No	Management Unit	Supply Base	Location	Certified Date	Remarks
	SOU Name				
1	Sg. Dingin	Sungai Dingin Oil Mill	Karangan, Kedah	12-Aug-11	
		Anak Kulim Estate			
		Sungai Dingin Estate			
		Somme Estate			
		Bukit Selarong Estate			
		Padang Buluh Estate			
		Bukit Hijau Estate			
Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	Kuala Kurau, Perak	5-Oct-11	
		Chersonese Estate			
		Kalumpang Estate			
		Tali Ayer Estate			
		Holyrood Estate			
3	Elphil	Elphil Oil Mill	Sg Siput, Perak	18-Jun-11	
		Kamuning Estate			
		Elphil Estate			
		Kinta Kellas Estate			
4	Flemington	Flemington Oil Mill	Teluk Intan, Perak	5-Oct-11	
		Flemington Estate			
		Bagan Datoh Estate			
		Sabak Bernam Estate			
		Sg. Samak Estate			
5	Seri Intan/Selaba	Seri Intan Oil Mill	Teluk Intan, Perak	3-Mar-11	
		Selaba Oil Mill			
		Seri Intan (+ Selaba) Estate			
		Sabrang Estate			

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		Sogomana Estate			
		Sg. Wangi Estate			
		Bikam Estate			
		Cluny (+ Bedford) Estate			
6	Tennamaram	Tennamaram Oil Mill	Bestari Jaya, Selangor	3-Mar-11	
		Tennamaram Estate			
		Sungai Buluh Estate			
		Bukit Talang Estate			
7	Bkt Kerayong	Bukit Kerayong Oil Mill	Kapar, Selangor	15-Apr-11	
		Bukit Kerayong Estate			
		Bukit Cheraka Estate			
		Elmina Estate			
8	East	East Oil Mill	Carey Island, Selangor	19-May-10	
		East Estate			
		Sepang Estate			
		Dusun Durian Estate			
9	West	West Oil Mill	Carey Island, Selangor	19-May-10	
		West Estate			
10	Bukit Puteri	Bukit Puteri Oil Mill	Raub, Pahang	7-Jul-11	
		Bukit Puteri Estate			
		Kerdau Oil Mill			
		Kerdau Estate			
11	Kerdau	Jentar Estate	Temerloh, Pahang	7-Jul-11	
		Mentakab Estate			
		Chenor Estate			
		Sg Mai Estate			
12	Jabor	Jabor Oil Mill	Kuantan, Pahang	7-Jul-11	
		Jabor Estate			
13	Labu	Labu Oil Mill	Nilai, Negeri Sembilan	30-Dec-11	
		Labu Estate			

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		New Labu Estate			
14	Tanah Merah	Tanah Merah Oil Mill	Port Dickson, Negeri Sembilan	19-May-10	
		Tanah Merah Estate			
		Bukit Pelandok Estate			
15	Sua Betong	Sua Betong Oil Mill	Port Dickson, Negeri Sembilan	18-Feb-14	
		Sua Betong Estate			
		Sengkang Estate			
		Bradwall Estate			
		PD Lukut Estate			
		Tampin Linggi Estate			
		Sg. Bahru Estate			
		Salak Estate			
Siliau Estate					
16	Kok Foh	Kok Foh Oil Mill	Bahau, Negeri Sembilan	7-Jul-11	
		Muar River Estate			
		Sg. Senarut Estate			
		Sg. Gemas Estate			
		Kok Foh Estate			
Bukit Pilah Estate					
		St. Helier Estate			
		Sungai Sabaling Estate			
		Pertang Estate			
17	Kempas	Kempas Oil Mill	Jasin, Melaka	19-May-10	
		Kempas Estate			
		Tangkah Estate			
		Kemuning Estate			
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	Jasin, Melaka	5-Oct-11	
		Serkam Estate			
		Diamond Jubilee Estate			
		Bukit Asahan Estate			
		Pagoh Oil Mill			

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19	Pagoh	Pagoh Estate	Muar, Johor	28-Jan-14	
		Welch Estate			
		Lanadron Estate			
		Pengkalan Bukit Estate			
20	Chaah	Chaah Oil Mill	Chaah, Johor	18-Nov-10	
		Chaah Estate			
		Sg. Simpang Kiri Estate			
		North Labis Estate			
21	Gunung Mas	Gunung Mas Oil Mill	Kluang, Johor	19-May-10	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of Gng. Mas.
		Gunung Mas Estate			
		Kempas Klebang Estate			
		Bukit Paloh Estate			
		Yong Peng Estate			
22	Bukit Benut	Bukit Benut Oil Mill	Kluang, Johor	5-Oct-11	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate			
		Lambak Elaeis Estate			
		CEP Nyior Estate			
23	Ulu Remis	Ulu Remis Oil Mill	Layang-layang, Johor	11-Apr-11	
		Ulu Remis Estate			
		Cenas Estate			
		Bukit Badak Estate			
		Tun Dr. Ismail Estate			
		Pekan Estate			
		Sembrong Estate			
24	Hadapan	Hadapan Oil Mill	Layang-layang, Johor	29-Mar-11	
		Sri Pulai Estate			
		Kulai Estate			

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		Layang Estate			
		CEP Renggam Estate			
26	Sandakan Bay	Tun Tan Siew Sin	Sandakan, Sabah	1-Oct-08	
		Tunku Estate			
		Tigowis Estate			
		Sentosa Estate			
		Segaliud Estate			
27	Melalap	Melalap Oil Mill	Tenom, Sabah	21-Jan-11	
		Melalap Estate			
		Sapong Estate			
28	Binuang	Binuang Oil Mill	Kunak, Sabah	16-Jan-09	
		Binuang Estate			
		Sungang Estate			
		Tingkayu Estate			
		Jeleta Bumi Estate			
29	Giram	Giram Oil Mill	Kunak Sabah	16-Jan-09	
		Giram Estate			
		Mostyn Estate			
30	Merotai	Merotai Oil Mill	Tawau, Sabah	16-Jan-09	
		Merotai Estate			
		Imam Estate			
		Tiger Estate			
		Table Estate			
		Lavang Oil Mill			
		Lavang Estate			
		Rasan Estate			
		Belian Estate			
		Kelida Estate			
31	Lavang	Lavang (Special) Estate	Bintulu, Sarawak	30-Dec-11	
		Pekaka Estate			
		Ruai Estate			

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32	Rajawali	Dulang Estate	Bintulu, Sarawak	30-Dec-11	
		Charquest Estate			
		Paroh Estate			
		Rajawali Oil Mill			
33	Derawan	Rajawali Estate	Bintulu, Sarawak	30-Dec-11	
		Samudera Estate			
		Semarak Estate			
34	Bintang	Bayu Estate	Johor	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
		Derawan Oil Mill			
		Derawan Estate			
		Sahua Estate			
		Takau Estate			
Damai Estate					
<p>Legends NA - NOT APPLICABLE</p>					

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INDONESIA

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	PT LAHAN TANI SAKTI	Alur Damai Mill	-	Rokan Hilir District – Riau	Certified	16-Jan-12	
2	PT SAJANG HEULANG	Mustika Mill	-	Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		KKPA-2 PT.SHE Estate	-		Certified		
		KKPA-3 PT.SHE Estate	-		Certified		
		KKPA-5 PT.SHE Estate	-		Certified		
3	PT LADANGRUMPUN SUBURUBADI	Angsana Mill	-	Tanah Bumbu District – South Kalimantan	Certified	9-Nov-16	LSI Plasma has been audited by the Certification Body.
		Pantai Bonati Estate	-		Certified		
		Gunung Sari Estate	-		Certified		
		SAP 1 Estate	2019		ST-2		
		KKPA-1 PT.SHE Estate	-		Certified		
		KKPA-4 PT.SHE Estate	-		Certified		
4	PT LANGGENG MUARAMAKMUR	Bebunga Mill	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Sungai Cengal Estate	-		Certified		
		Bakau Estate	-		Certified		
		KKPA Sungai Cengal Estate	-		Certified		
5	PT KRIDATAMA LANCAR	Sukamandang Mill	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	2-Sep-16	
		Sapiri Estate	-		Certified		
		Barasdanum Estate	-		Certified		
			-				
		Kuala Kuayan Estate	-		Certified		

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6	PT BAHARI GEMBIRA RIA	Ladang Panjang Mill	-	Muaro Jambi District - Jambi	Certified	9-Jul-12	Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?returnURL=%2Fmembership%2Fapex%2FRSPOCertificateSearch&file=00P9000001OioYJEAZ
		Ladang Panjang	-		Certified		
		Plasma BGR Estate	2020		-		
7	PT TUNGGAL MITRA PLANTATIONS	Manggala Mill	-	Rokan Hilir District – Riau	Certified	25-Nov-10	
		Manggala 1 Estate	-		Certified		
		Manggala 2 Estate	-		Certified		
		Manggala 3 Estate	-		Certified		
8	PT PARIPURNA SWAKARSA	Pondok Labu Mill	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Pondok Labu	-		Certified		
		Binturung Estate	-		Certified		
		Rampa Estate	-		Certified		
		Sesulung Estate	-		Certified		
9	PT BERSAMA SEJAHTERA SAKTI	Gunung Aru Mill	-	Kotabaru District – South Kalimantan	Certified	21-Oct-16	The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.
		Gunung Aru	-		Certified		
		Gunung Kemas Estate	-		Certified		
		Laut Timur Estate	-		Certified		
		Pantai Timur Estate	-		Certified		

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		KKPA MBP	2019					
10	PT GUTHRIE PECCONINA	Rantau Panjang Mill	-	Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	Sungai Jernih Estate and the KKPA Estates has undergone audit.	
		Rantau Panjang	-		Certified			
		Bumi Ayu Estate	-		Certified			
		Karang Ringin Estate	-		Certified			
		Napal Estate	-		Certified			
		Mangun Jaya Estate	-		Certified			
		Sungai Jernih Estate and GPI KKPA	2020					
		Estate						
11	PT LAGUNA MANDIRI	Rantau Mill	-	Kotabaru District – South Kalimantan	Certified	30-Dec-11		
		Rantau	-		Certified			
		Betung	-		Certified	1-Apr-14		
		Matalok Estate	-		Certified			
		Sekayu Estate	-		Certified			
12	PT INDOTRUBA TENGAH	Sekunyir Mill	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10		
		Sekunyir	-		Certified			
			-					
		Seruyan Estate	-		Certified			
13	PT SWADAYA ANDIKA	Selabak Mill	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12		
		Selabak	-		Certified			
		Randi Estate	-		Certified			
		Sangkoh Estate	-		Certified			
		Lanting Estate	-		Certified			
14	PT BINA SAINS CEMERLANG	Sungai Pinang Mill	-	Musi Rawas District – South Sumatera	Certified	11-Sep-12		
		Sungai Pinang	-		Certified			
		Bukit Pinang Estate	-		Certified			

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15	PT TEGUH SEMPURNA	Pematang Mill	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	9-Sep-16	
		Pematang	-		Certified		
		Kawan Batu Estate	-		Certified		
		Hatan Tiring Estate	-		Certified		
		Batang Garing Estate	-		Certified		
16	PT BHUMIREKSA NUSA SEJATI	Teluk Bakau Mill	-	Indra Giri Hilir District – Riau	Certified	1-Dec-16	
		Teluk Bakau	-		Certified		
		Mandah	-		Certified		
		Nusa Lestari Estate	-		Certified	1-Apr-14	
		Nusa Perkasa Estate	-		Certified		
		Rotan Semelur Estate	-		Certified		
17	PT ANEKA INTIPERSADA	Teluk Siak Mill	-	Pekanbaru, Siak District – Riau	Certified	8-Dec-16	
		Teluk Siak	-		Certified		
		Pinang Sebatang Estate	-		Certified		
		Aneka Persada Estate	-		Certified		
18	PT TAMACO GRAHA KRIDA	Ungkaya Mill	-	Morowali District – Sulawesi Tengah	Certified	10-Jul-12	
		Ungkaya	-		Certified		
		Plasma TGK Estate	-		Certified		
19	PT SIME INDO AGRO	Bukit Ajong Mill	-	Sanggau District –West Kalimantan	Certified	18-Jul-16	Land legalisation process is still in process
		West Estate	-		Certified		
		East Estate	-		Certified		
		East* Estate	2019		-		
		East Plasma Estate	-		Certified		
		West Plasma Estate	-		Certified		
		Blang Simpo Mill	2020		Certified		

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20	PT PADANG PALMA PERMA/PT PERKASA SUBUR SAKTI	Tamiang (PT PPP) Estate	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3-May-13	
		Batang Ara (PT PSK) Estate	-		Certified		
		Blang Simpo-01 Estate	-		Certified		
		Blang Simpo-02 Estate	-		Certified		
21	PT SANDIKA NATAPALMA	Lembiru Mill	-	Ketapang District – West Kalimantan	Certified	3-Jul-14	Perijinan' process is ongoing
		Lembiru	-		Certified		
		Awatan Estate	-		Certified		
		Karya Palma Estate	2019		-		
		KKPA SNP Estate	2020		-		
		Pelanjau (PT BAL) Estate	2019				
22	PT BUDIDAYA AGRO LESTARI			Ketapang District – West Kalimantan	-	3-Jul-14	Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Sungai Putih (PT BAL) Estate	2019		-		
		Beturus (PT BAL) Estate	2019		-		
		KKPA BAL Estate	2020		-		
23	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	2019	Sanggau District – West Kalimantan	-	NA	The case is under RSPO Complaints Panel Please find latest information on 'Updates on PT MAS' worksheet
		MAS 1 Estate	2019		-		
		MAS 2 Estate	2019		-		
		MAS 4 Estate	2019		-		
		Plasma MAS Estate	2020		-		

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INDONESIA – PT MAS UPDATE

RSPO Certification Target Date for PT MAS	The target date for certification is by 2017 subject to the progress of the matter being resolved.
Overview of RSPO Certification Progress for PT MAS	<p>PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress regular basis since November 2012. The latest progress report submitted to RPSO dated 8 Sept 2017.</p> <p>SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>
Progress Updates	<p>Progress Update for PT MAS</p> <p>Regular discussion is ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2013. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have Dispute Settlement Facility (DSF) in June 2014. Hence, there are two groups of communities: TKPP (7 of 9 villages) and Kerunang & Entapang (2 of 9 villages). To-date, 28 TKPP meetings have been conducted. Issues related to the 14 demands are closed except for two items related to land matters which is ownership of nucleus plant and allocation of plasma farm within the plasma original village/customary area. The most recent meeting was held on 27 July 2018.</p> <p>SDP is engaging with the local authority on this matter together with TKPP. The latest TKPP meeting discussed mainly on operational issues especially on security issues.</p> <p>Engagement with RSPO: Sime Darby Plantation is submitting a monthly basis report to RSPO on the case. Five monthly updates/ responses have been submitted to RSPO to-date. It is noted that on 26 September 2017, the Complaints Panel has convened and has issued a letter related to the issue of Sime Darby's plans to divest its operations.</p> <p>On 3 October 2017, the Complaints Panel's issued a response on Sime Darby's plans to divest its operations (PT MAS). To-date, Sime Darby Plantation is submitting monthly updates/responses to RSPO Secretariat on the matter with the latest submission on 28 May 2018.</p> <p>RSPO has written to SDP on 17 Aug 2018 mentioning that the Complaints Panel as part of its deliberation had directed both parties, the Communities (supported by TuK) and Sime for a meeting for the purposes of verifying the progress of the complaints, specifically the status of the 14 demands. The tripartite meeting between the communities, SDP and RSPO.</p> <p>Engagement with TuK-Indonesia: SDP continues to work on direct engagement with PAC – working towards a consensus with the PAC to resolve the issues. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29</p>

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NBPOL

MU	SOU Name	Time Bound Plan	Location	Status	Certified Date	
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Outgrowers – West Zone				
		Outgrowers – Central Zone				
		Outgrowers – MBA East Zone				
		Outgrowers – MBE East Zone				
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Giligili Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate				
		West Sagarai Estate				
3	Poliamba (POL)	Poliamba Oil Mill	NA	New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		North Smallholders (613)				
		South Smallholders (863)				
		West Smallholders (309)				

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4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Gusap East (Gusap) Estate				
		Gusap West (Paddock) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Mosa Oil Mill				
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				

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No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
6	West New Britain (WNB)	Waisisi Estate	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kautu Estate				
		Karaisu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
Ove Estate						
Tamare Estate						
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Munum Estate	Sep-20	Markham Farms,	RaCP	The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never

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		Erap Estate	Sep-20			been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.
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LIBERIA

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Remarks
	SOU Name					
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	2019	Grand Cape Mount County	Not yet Certified	<p>In May – September 2011, SDPL has undergone a series of assessment including Social and Environmental Impact Assessment and High Conservation Value. Assessment in conformance with the RSPO New Planting Procedures to begin planting. *Note: RSPO NPP Announcements can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p> <p>SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p>
		Bomi Estate				
		Lofa Estate				
		Matambo Estate				
		Grand Cape Mount Estate				