



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

File Ref.: ES11320001

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : WILMAR INTERNATIONAL LIMITED – SAREMAS 1 CERTIFICATION UNIT**

**PARENT COMPANY : WILMAR INTERNATIONAL LIMITED**

**RSPO MEMBERSHIP NO.: 2-0017-05-000-00**

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

Certification Unit	Mill / Estate	Location		
		Latitude	Longitude	Address
Saremas 1 Certification Unit (CU)	Saremas 1 POM	3°31'32.199"N	113°44'39.092"E	18 KM off KM 115, Bintulu – Miri Road, 97008, Bintulu Sarawak Malaysia
	Saremas 1 Estate	3°31'20.932"N	113°45'12.386"E	
	Suai Estate	3°35'43.549"N	113°44'10.349"E	

**MAP :** See Attachment 1

**AUDIT DATE :** 9-12 April 2019

**DURATION :** 16 auditor days

**TYPE OF AUDIT :**  Annual Surveillance Audit 4

Recertification Audit

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

**SCOPE OF CERTIFICATION:** Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

**VALIDITY OF RSPO CERTIFICATE :** 14 June 2015 – 13 June 2020

**The following attachments form part of this report:**

Non-conformity Report(s)

List of additional site(s)

**Report by Audit Team Leader**

**Acknowledgement by Client's Representative**

Name : Mohd Ab Raouf bin Asis

Name : Foo Siew Theng

Signature :

Signature :

Date : 15/07/2019

Date : 23 July 2019

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDIT

Stage 2 audit / Recertification audit			
On-site audit date	: 27-30/4/15	No. of auditor days	: 15
Audit team	: Khairul Najwan B. Ahmad Jahari, Mohd Hafiz B. Mat Hussain, Valence Shem, Jagathesan a/l Suppiah, Ismail B. Ibrahim		
No. of major NCR	: 2	Indicator: 4.7.2 , 6.12.3	Closing date : 28/5/15
No. of minor NCR	: 7	Indicator : 1.3.1, 4.8.2, 5.3.3, 5.4.1, 6.2.3, 6.8.3, 6.9.3	
Indicate the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers
	√	-	√
	Contract workers	NGOs	Govt. agency
	√	-	-
Indigenous people	Contractor	Others (Please specify)	
	-	√	-
Supply base sampled	: Saremas 1 Estate & Suai Estate		

Annual Surveillance Audit 1			
On-site audit date	: 16 <sup>th</sup> – 20 <sup>th</sup> May 2016	No. of auditor days	: 15
Audit team	: Mohd Hafiz Mat Hussain, Khairul Najwan Ahmad Jahari, Selvasingam T Kandiah, Zulkefli Haron		
No. of major NCR	: -	Indicator: -	Closing date :10/8/2016
No. of minor NCR	: 2	Indicator : 2.1.3 and 6.1.4	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers
	√	-	√
	Contract workers	NGOs	Govt. agency
	√	-	-
Indigenous people	Contractor	Others (Please specify)	
	-	√	√ UNiMAS (via phone call)
Supply base sampled	: Saremas 1 Estate and Saremas 2 Division 1 Estate		
Changes since the last audit	: No significant changes since last audit		

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Annual Surveillance Audit 2			
On-site audit date :	10 – 13 April 2017	No. of auditor days :	16
Audit team :	Mohd Razman Salim, Mohd Ab Raouf Asis, Rahayu Zulkifli, Amir Bahari & Zulkarnain Abdullah		
No. of major NCR :	2	Indicator: 2.1.1 & 6.5.2	Closing date : 05 June 2017
No. of minor NCR :	2	Indicator : 4.6.10 & 6.2.3	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	√	-	√
	Contract workers	NGOs	Govt. agency
	√	-	-
	Indigenous people	Contractor	Others (Please specify)
	-	√	-
Supply base sampled :	Suai Estate & Saremas 1 Estate		
Changes since the last audit :	Since 1 February 2017, the Saremas 2 (Div. 1) Estate had been removed from this certification unit.		

Annual Surveillance Audit 3			
On-site audit date :	2-5 April 2018	No. of auditor days :	16 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Mohd Ab Raouf Asis, Khairul Najwan Ahmad Jahari, Mohd Norddin Abdul Jalil.		
No. of major NCR :	1	Indicator: 4.7.3	Closing date: 2 July 2018
No. of minor NCR :	1	Indicator: 4.1.2	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities
	√		√
	Contract workers	NGOs	Govt. agency
	√		√ (Sarawak Forestry Dept.)
	Indigenous people	Contractor	Others (Please specify)
	√	√	
Supply base sampled :	Saremas 1 Estate and Suai Estate (100% sampling)		
Justification of audit planning	Total allocation of auditor days for Saremas 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Saremas 1 & Suai Estate = 6 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Unproductive area.		
Changes since the last :	See notes provided in Table 1 - Summary of Information.		

## RSPO PUBLIC SUMMARY REPORT

audit		
Report approved by	: Radziah Mohd Daud	Approval date : 10 July 2018

Annual Surveillance Audit 4				
On-site audit date	: 9-12 April 2019	No. of auditor days	: 16	
Audit team	: Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (A), Dzulfiqar bin Azmi (A), Mohd Norddin Abdul Jalil (A).			
No. of major NCR	: 4	Indicator: 4.3.4, 4.7.3, 6.1.2, 6.10.2	Closing date: 8/07/2019	
No. of minor NCR	: 6	Indicator: 2.2.2, 4.3.5, 5.6.3, 6.1.4, 6.2.3, 4.5.4 (Requirement for uncertified management unit)		
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	Contractors	Others (Please specify)	
	/	/		
Supply base sampled	: Saremas 1 POM, Saremas 1 Estate, Suai Estate			
Justification of audit planning	Total allocation of auditor days for Saremas 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Saremas 1 & Suai Estate = 6 days each estate for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Unproductive area.			
Changes since the last audit	: Saremas 1 certified area was reduced due to land acquisition by the government. 0.71 ha was allocated for Petronas pipeline gas.			
Report approved by	: Radziah Mohd Daud	Approval date	: 15/07/2019	

# RSPO PUBLIC SUMMARY REPORT

## SUMMARY OF INFORMATION

### TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>Projection Period</b>	March 2015 – February 2016	May 2016 – April 2017	April 2017 – March 2018	April 2018 – March 2019	March 2019 - February 2020
<b>Certified FFB Processed (MT)</b>	200,753.98	183,920.72	164,875.00	172,275.00	179,083.33
<b>Production of Certified CPO (MT)</b>	43,731.75	51,480.00	42,814.75	37,900.50	40,122.84
<b>Production of Certified PK (MT)</b>	7,841.10	9,594.00	7,536.25	6,546.45	6,368.82
<b>Certified Areas (Ha)</b>	*13,568.81	13,309.98	***11,679.08	11,678.49	*****11,677.78
<b>Planted Area (Ha) (Mature + Immature)</b>	*10,551.83	**10,448.22	9,190.35	****9,288.23	9,284.92
<b>Production Area (Ha) (Planted – Immature)</b>	7,480.94	7,676.53	6,894.73	6,257.25	6,760.76
<b>HCV Areas</b>	517.82	517.82	***324.95	324.95	324.95
<b>REMARKS</b>	<p>2015 *The total combined land area of the three estates (3) estates was 13,568.81 Ha of which 10,551.83 ha were planted with oil palm. There was no change in the combined land area for all the three estates but an exclusion from title area of 23.86 ha (from plantable area) at Saremas 1 Estate due to acquisition from the government for cross country Petronas Gas Pipeline Project during December 2011.</p> <p>2016 **The main reason for decreasing in hectares of the planted area for Saremas 1 i.e. 98.14 ha, was due to the exclusion of Saremas 2 (Div. 1) Estate from Saremas 1 CU. Saremas 2 (Div.1) Estate was renamed as a new certification unit, called Saremas 2 CU.</p> <p>2017 ***Saremas 2 (Div. 1) Estate has been excluded from this CU since 1 February 2017. Saremas 2 has been declared as new CU instead of division, therefore, the overall certified area was further reduced. Noted that the current HCV area for Saremas 1 CU is 324.95 ha which come from Saremas 1 Estate (225.24 ha) and Suai Estate (99.71 ha). In the last report, the riparian was not included in as HCV area. However, starting in 2017, the riparian was fully surveyed and had been included in the area statement.</p> <p>2018 ****Saremas 1 certified area was reduced due to land acquisition 0.59 ha from government for Petronas Pipeline gas. For planted area, it was noted that there are some area classified as unproductive area by the management of Saremas 1. By their definition, the “unproductive area” (instead of declared as the unproductive area) was taken out from the total planted area for the purpose of budgeting the cost per ha (this has been practiced by the CU since forever). However, during this audit, it has been verified that some of the “unproductive area” has been replanted again, hence the planted area has been revised to include the additional 97.88 ha. The audit team has verified and confirmed that the additional hectares did not come from neither NPP nor conversion of other crop to palm oil planting. It was due to the inclusion of the “unproductive area” into the total planted area.</p> <p>2019 *****Saremas 1 certified area was reduced due to land acquisition 0.71 ha from government for Petronas Pipeline gas.</p>				

### TABLE 2

	PO	PK
<b>Last years certified volume (MT)</b>	37,900.50	6,546.45
<b>Last years actual certified sold (MT)</b>	6,165.07	4,418.04
<b>Last years actual sold under other schemes (MT)</b>	27,566.00	0.00
<b>Last year’s sold conventional (MT)</b>	0.00	0.00
<b>New year certified volume (MT)</b>	40,122.84	6,368.82

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## RSPO PUBLIC SUMMARY REPORT

### 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 recognized standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

#### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Ab Raouf bin Asis	Audit Team Leader, Social	Holds B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM. He had several years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and MSPO.
Mohd. Zulfakar Kamaruzaman	Auditor, Supply Chain, HCV	Holds a B.Sc. Forestry from UPM. He had several years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Dzulfiqar bin Azmi	Auditor, Safety and Environment	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO and MSPO.
Mohd Norddin Abd Jalil	Auditor / Good Agricultural Practices	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.

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### 1.3 Audit methodology

The audit covered the Saremas 1 palm oil mill and two of its supply base. The sampling of the number of the supply base was using the formula of  $0.8\sqrt{y}$ . However, for this audit, 100% sampling was conducted where both supply bases were covered i.e. Saremas 1 Estate and Suai Estate. The audit included an on-site audit to the estates, mill, linesite, local communities, contractors and suppliers to verify the implementation of the requirement of the RSPO certification system. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### 1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

### 1.5 Audit plan:

Refer to Attachment 2.

### 1.6 Date of next audit:

The next surveillance audit will be conducted within 12 months but not sooner than 8 months from this audit.

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Saremas 1 certification unit (CU) is under the Saremas Sdn. Bhd. (SSB), a wholly owned subsidiary of PPB Oil Palms Berhad (PPB Oil Palms). The CU comprised of the Saremas 1 Palm Oil Mill, Saremas 1 Estate and Suai Estate. All the estates are owned by PPB. It has been noted that Saremas 2 (Division 1) had been removed since February 2017 leaving only Saremas 1 Estate and Suai Estate within Saremas 1 CU. The total combined land area of the two (2) estates is 11,678.49 ha of which 9,284.92 ha were planted with oil palm. The HCV area for Saremas 1 CU is 324.95 ha which come from Saremas 1 Estate (225.24 ha) and Suai Estate (99.71 ha). The Saremas1 POM has a mill capacity of 60 mt/hr.



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

The FFB was sourced from company owned estates that were certified and small holders and small growers surrounding the Saremas 1 CU.

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

Table 1: Actual FFB production by the supply base for the last reporting period  
(March 2018 to February 2019)

Estates	FFB Production	
	Tonnes	Percentage (%)
Saremas 1 Estate	83,270.01	40.87
Suai Estate	68,700.15	33.72
<b>Total</b>	<b>151,970.16</b>	<b>74.60</b>
Third party suppliers (non-certified)	51,751.04	25.40
<b>Grand total</b>	<b>203,721.20</b>	<b>100.00</b>

Table 2: Projected FFB production by the supply base for the next reporting period  
(March 2019 to February 2020)

Estates	FFB Production	
	Tonnes	Percentage (%)
Saremas 1 Estate	92,283.33	38.70
Suai Estate	86,800.00	36.40
<b>Total</b>	<b>179,083.33</b>	<b>75.09</b>
Third party suppliers (non-certified)	59,400.00	24.91
<b>Grand total</b>	<b>238,483.33</b>	<b>100.00</b>

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**Table 3: Actual FFB received and CPO & PK dispatch by the Saremas 1 POM for the last reporting period  
(March 2018 to February 2019)**

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	203,721.20
FFB Processed	203,451.98
Certified FFB Processed	151,970.16
Non-certified FFB Processed	51,751.04
<b>Crude Palm Oil (CPO)</b>	
Overall CPO Production	45,190.10
Certified CPO Production	33,933.01
Certified CPO delivered as RSPO As at 1 March 2018	0.00
Certified CPO delivered as RSPO	6,165.07
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	27,566.00
Credits traded through Books and Claim	0.00
<b>Palm Kernel (PK)</b>	
Overall PK Production	5,877.47
Certified PK Production	4,417.55
Certified PK delivered as RSPO As at 1 March 2018	0.49
Certified PK delivered as RSPO	4,417.55
Certified PK delivered as non-RSPO	0.00
Certified PK delivered under other sustainable schemes	0.00
Credits traded through Books and Claim	0.00

**Table 4: Projected FFB received and CPO & PK dispatch by Saremas 1 POM of next reporting period  
(March 2019 to February 2020)**

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	238,483.33
FFB Processed	238,483.33
Certified FFB Processed	179,083.33
Non-certified FFB Processed	59,400.00
<b>Crude Palm Oil (CPO)</b>	
Overall CPO Production	53,437.33
Certified CPO Production	40,122.84
Certified CPO delivered as RSPO	40,122.84
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00
<b>Palm Kernel (PK)</b>	
Overall PK Production	8,477.57
Certified PK Production	6,368.82
Certified PK delivered as RSPO	6,368.82
Certified PK delivered as non-RSPO	0.00
Certified PK delivered under other sustainable schemes	0.00

## RSPO PUBLIC SUMMARY REPORT

Table 5: Planted and certified area of the Saremas 1 CU

Estate	Planted (ha)	Certified (ha)
Saremas 1 Estate	4,610.29	6,007.88
Suai Estate	4,674.63	5,669.90
<b>Total</b>	<b>9,284.92</b>	<b>11,677.78</b>

Table 6: Planting profile for Saremas 1 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2010	2nd	Mature	884.77	19.19%
2011	2nd	Mature	307.73	6.67%
2012	2nd	Mature	815.64	17.69%
2013	2nd	Mature	1108.57	24.05%
2014	2nd	Mature	577.75	12.53%
2017	2nd	Immature	372.38	8.08%
2018	2nd	Immature	543.45	11.79%
<b>Total</b>			4610.29	100.00

Table 7: Planting profile for Suai Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	1st	Mature	321.29	6.87
1999	1st	Mature	46.93	1.00
2000	1st	Mature	295.91	6.33
2001	1st	Mature	267.25	5.72
2002	1st	Mature	271.86	5.82
2003	1st	Mature	251.67	5.38
2004	1st	Mature	222.55	4.76
2005	2nd	Mature	162.97	3.49
2006	2nd	Mature	75.62	1.62
2012	2nd	Mature	145.04	3.10
2014	2nd	Mature	419.83	8.98
2015	2nd	Mature	585.38	12.52
2016	2nd	Immature	590.23	12.63
2017	2nd	Immature	482.28	10.32
2018	2nd	Immature	535.82	11.46
<b>Total</b>			4674.63	100.00

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### 2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

#### Saremas 1 CU

Name	:	Mr. Chang Sip Woon
Position	:	Assistant General Manager
Address	:	PPB Oil Palms Berhad Sarawak Operations, Lot 964, Sublot 7, Taman Seaview Commercial Centre, Jalan Tanjung Batu, P.O Box 730, 97008 Bintulu, Sarawak MALAYSIA
Phone no.	:	+ 60 85 325 713/+60 86 333 286
Fax no.	:	+ 60 85 495 010/+60 86 315 220
		+ 60 86 315 223/+60 86 315 221
Email	:	<a href="mailto:sipwoon.chang@my.wilmar-intl.com">sipwoon.chang@my.wilmar-intl.com</a>

### 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

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

All of the estates and mills belonged to PPB had been certified to RSPO P&C. However, Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 7.

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

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

N/A

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

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

If no, please state reasons Not applicable. There was no associated smallholders supplying FFB to the CU.

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

N/A

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

No

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

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

3.5. Complaint received from stakeholder (if any)

No complaints from stakeholders were observed.

### 4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 4 )	List : 6	MN02 2019, MZK 01 2019, MZK 02 2019, DA 02 2019, MAR 02 2019, MAR 03 2019
Total no. of major NCR(s) (details refer to Attachment 4)	List : 4	MN 01 2019, DA 01 2019, 6.1.2, 6.10.2

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

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

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### 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) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

*Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.*

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

Audit Team Leader : MOHD AB RAOUF BIN ASIS

(Name)



(Signature)

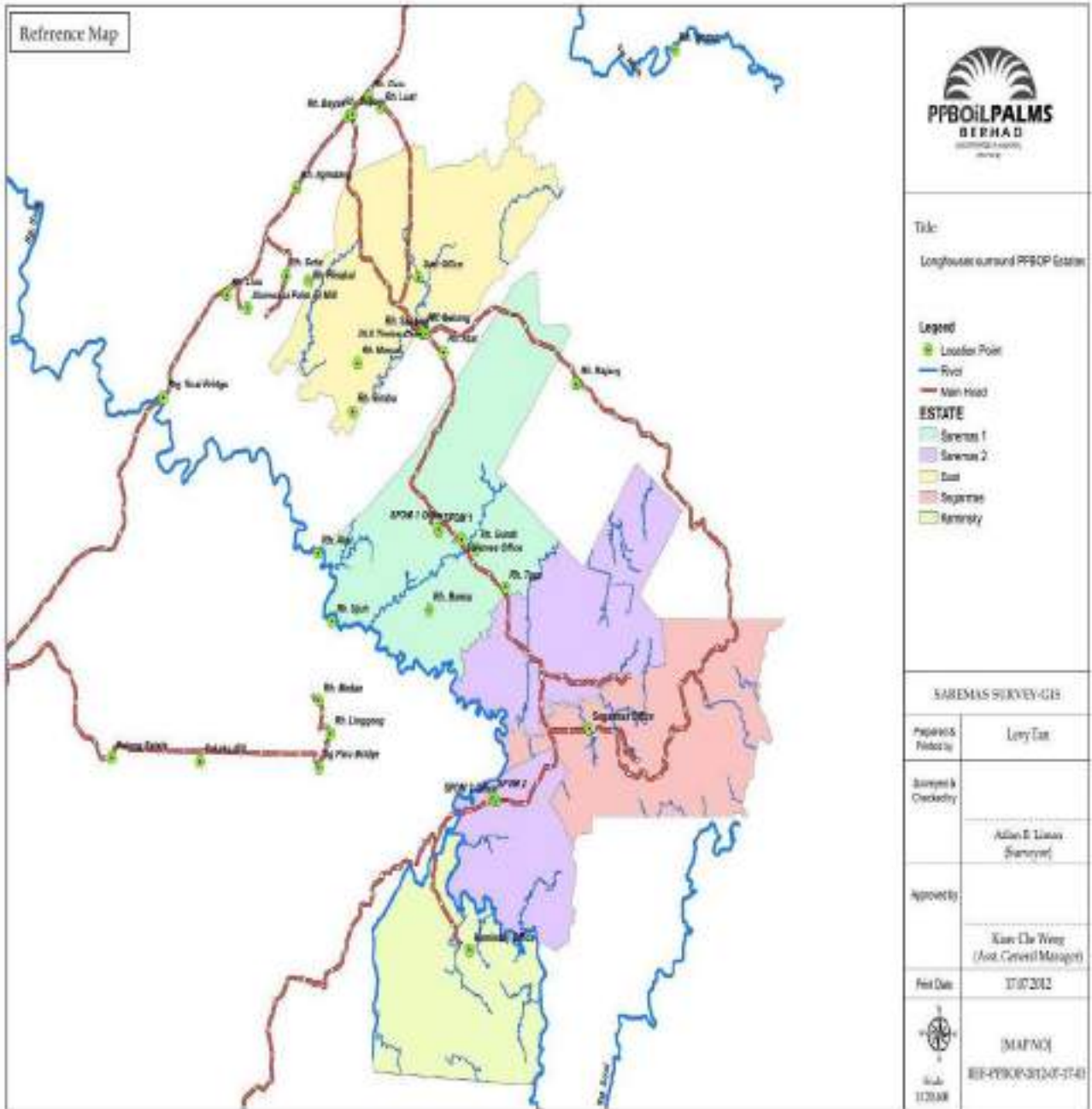
8/7/2019

(Date)

# RSPO PUBLIC SUMMARY REPORT

Attachment 1

## Map of Saremas 1



# RSPO PUBLIC SUMMARY REPORT

Attachment 2

## SURVEILLANCE AUDIT PLAN (ASA 4) SAREMAS 1

### 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** : 9 – 12 April 2019

3. **Site of assessment** : i) Saremas 1 POM  
ii) Saremas 1 Estate  
iii) Suai Estate

### 4. Reference Standard :

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

### 5. Assessment Team

- (i) Trainee Audit Team Leader : Mohd Ab Raouf bin Asis (Social)
- (ii) Auditor : i) Mohd Zulfakar bin Kamaruzaman (HCV, Supply Chain)  
ii) Dzulfiqar bin Azmi (Safety, Environment)  
iii) Mohd Norddin Abd Jalil (GAP)

*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. For major non conformities raise in the surveillance audit, correction shall be verified in the next audit. Recurring major non- conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.



## RSPO PUBLIC SUMMARY REPORT

### 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

## RSPO PUBLIC SUMMARY REPORT

### Day 1-9/4/2019 (Tuesday):

Time	Activities / areas to be visited				Auditee
8.30 -9.00am	Opening Meeting at Saremas 1 Estate office: <ul style="list-style-type: none"> <li>• Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>• Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings.</li> <li>• Logistic arrangement</li> </ul>				All
9.00 - 1.00pm	To assign each audit team members – site and the P&C requirements				
	<b>Raouf</b>	<b>Zulfakar</b>	<b>Dzulfiqar</b>	Norddin	Guide(s) for each auditor
	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Land titles user rights</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> </ul>	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Inspection of protected sites with HCV attributes</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• HCV Assessment management plan &amp; implementation</li> <li>• Training and skill development programs</li> <li>• Time bound plan and uncertified management units</li> </ul>	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Training and skill development programmes</li> <li>• Continuous improvement</li> </ul>	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Commitment to long-term economic and financial viability</li> <li>• Good Agricultural Practice- witness activities at site (weeding/spraying, etc)</li> <li>• EFB mulching, POME application</li> <li>• Chemical store/fertilizer Plantation on hilly/swampy area</li> <li>• IPM implementation, training and safe use of agro-chemicals.</li> <li>• New planting</li> <li>• Continuous improvement</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

1.00 – 2.00pm	<b>LUNCH BREAK</b>	All
2.00 – 5.00pm	Continue assessment	Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 2 audit	All

### Day 2-10/4/2019 (Wednesday):

Time	Activities / areas to be visited				Auditee
8.30 .– 1.00 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	<b>Raouf</b>	<b>Zulfakar</b>	<b>Dzulfiqar</b>	<b>Norddin</b>	Guide(s) for each auditor
	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Land titles user rights</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> </ul>	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Inspection of protected sites with HCV attributes</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• HCV Assessment management plan &amp; implementation</li> <li>• Training and skill development programs</li> <li>• Time bound plan and uncertified management units</li> </ul>	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Training and skill development programmes</li> </ul>	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Commitment to long-term economic and financial viability</li> <li>• Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>• EFB mulching, POME application</li> <li>• Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals.</li> <li>• New planting</li> <li>• Continuous improvement</li> </ul>	

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			Continuous improvement		
1.00 – 2.00pm	<b>LUNCH BREAK</b>				All
2.00 – 5.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Continue assessment	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Inspection of protected sites with HCV attributes</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• HCV Assessment management plan &amp; implementation</li> <li>• Training and skill development programs</li> <li>• Time bound plan and uncertified management units</li> </ul>	Continue assessment	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Commitment to long-term economic and financial viability</li> <li>• Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>• EFB mulching, POME application</li> <li>• Chemical store/fertilizer</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>• New planting</li> <li>• Continuous improvement</li> </ul>	Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 2 audit				All

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**Day 3-11/4/2019 (Thursday):**

Time	Activities / areas to be visited				Auditee
8.30 .– 1.00 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	<b>Raouf</b>	<b>Zulfakar</b>	<b>Dzulfiqar</b>	<b>Norddin</b>	Guide(s) for each auditor
	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Land titles user rights</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> </ul>	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Inspection of protected sites with HCV attributes</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• HCV Assessment management plan &amp; implementation</li> <li>• Training and skill development programs</li> <li>• Time bound plan and uncertified management units</li> </ul>	<u>Saremas 1 POM</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Training and skill development programs</li> <li>• Continuous improvement</li> </ul>	<u>Suai Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Commitment to long-term economic and financial viability</li> <li>• Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>• EFB mulching, POME application</li> <li>• Chemical store/fertilizer Plantation on hilly/swampy area</li> <li>• IPM implementation, training and safe use of agro-chemicals.</li> <li>• New planting</li> <li>• Continuous improvement</li> </ul>	
1.00 – 2.00pm	<b>LUNCH BREAK</b>				All
2.00 – 5.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Continue assessment	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each

## RSPO PUBLIC SUMMARY REPORT

					auditor
5.00 pm	Audit team discussion / End of Day 2 audit				All

### Day 4-12/4/2019 (Friday):

Time	Activities / areas to be visited				Auditee
8.30 .– 12.30 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	<b>Raouf</b>	<b>Zulfakar</b>	<b>Dzulfiqar</b>	<b>Norddin</b>	Guide(s) for each auditor
	<u>Saremas 1 POM</u> <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Land titles user rights</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> </ul>	<u>Saremas 1 POM</u> <p>Site visit and assessment on Supply Chain Implementation including the</p> <ul style="list-style-type: none"> <li>• Model used</li> <li>• General Chain of Custody</li> <li>• System Requirements for the supply chain</li> <li>• Documented procedures</li> <li>• Purchasing and goods in</li> <li>• Outsourcing activity</li> <li>• Sales and goods out</li> <li>• Processing</li> <li>• Records keeping</li> <li>• Registration</li> <li>• Training</li> <li>• Claims</li> <li>• Time bound plan and uncertified management units</li> </ul>	<u>Saremas 1 POM</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Training and skill development programs</li> <li>• Continuous improvement</li> </ul>	<u>Saremas 1 Estate</u> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Commitment to long-term economic and financial viability</li> <li>• Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>• EFB mulching, POME application</li> <li>• Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals.</li> <li>• New planting</li> <li>• Continuous improvement</li> </ul>	
12.30 – 2.00pm	<b>JUMAAT PRAYER / LUNCH BREAK</b>				All

## RSPO PUBLIC SUMMARY REPORT

2.00 – 4.00pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.	Guide(s) for each auditor
4.00 -4.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager	
4.30 -5.00 pm	Closing meeting at CU / End of audit	All

**RSPO PUBLIC SUMMARY REPORT**

Attachment 3

**RSPO P&C AUDIT CHECKLIST AND FINDINGS**

**Principle 1: COMMITMENT TO TRANSPARENCY**

Clause	Indicators	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	Saremas 1 CU had continued to maintain a comprehensive system with respect to this criterion. Request Form for their stakeholders or other interested party who had viewed / obtained document related to RSPO and Record of Visitation by government agencies such as DOE and DOSH were maintained. In Saremas 1 CU, the management documents relating to environment, social and legal issues, are made available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.
	1.1.2 Records of requests for information and responses shall be maintained. Major Compliance	YES	The CU had continued to maintain a comprehensive system with respect to this criterion. Record of complaint and grievances were made available and details of complaints and grievances for Suai Estate and Saremas 1 Estate were recorded in the Complaint Form, Request Form and Public Information Request (PIR) Form.
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	The land titles were kept in hard copy. These documents were verified during the audit. Noted that the Saremas 1 POM and Saremas 1 Estate are under the same land title, while the Suai Estate has its owned land title. It was noted about 409.31 ha was set aside for the local communities surrounding the Suai Estate.
	Occupational health and safety plans (Criterion 4.7);	YES	The occupational health and safety plans 2019 was made available and verified at Saremas 1 CU. The management has established OSH objectives & targets as verified for 2019. The document titled Sustainability Unit-Environmental, Safety & Health Plan 2019 was prepared by the Sustainability Unit for the entire Group operating units. Among the activities planned are OSH training, medical surveillance, water sampling, safety world day, audiometric test etc. The CU has implemented the OSH activities followed the OSH plan.
	Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	Social Impact Assessments was carried out in 2008 which formed the basis of the subsequent Action Plans. These Action Plans are reviewed at least once a year, and are publicly available and verified at all visited areas. The latest document was the Action Plan for Social Impact Assessment (2017-2018) was updated on March 2018. The updates are extracted from issues raised during stakeholder meetings such as the Joint Consultative Committee-Public Stakeholders (JCC-PS), Social and Welfare Committee, Community Based Development Committee (CBDC), and, Women and Children Committee. All these meetings were verified during the audit through the meeting minutes. Environmental Impact Assessment (EIA) Plan and identification of environmental aspect and its associated impact was done by using "Identification of EAI & Evaluation of Significance form" were made available at visited sites. Refer to Criteria 5.1.



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		HCV documentation summary (Criteria 5.2 and 7.3);	YES	HCV documentation summary including action plan 2017/2018 was made available at all visited estates during the audit.
		Pollution prevention and reduction plans (Criterion 5.6);	YES	Pollution prevention and reduction plans maintained available (refer to Criterion 5.6).
		Details of complaints and grievances (Criterion 6.3);	YES	Details of complaints and grievances for Saremas 1 POM, Saremas 1 Estate and Suai Estate were recorded in either the Complaints and Grievance File, or the Complaints Form (" <i>Surat Aduan</i> ") or Request Form. Some complaints were also received verbally during stakeholder meetings. All the documents were available and verified at Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate.
		Negotiation procedures (Criterion 6.4);	YES	Negotiation procedure was stated in the Saremas Group's "No Deforestation, No Peat, No Exploitation Policy" dated in Dec 2013 under the paragraph entitled "Resolve All Complaints and Conflicts Through an Open, Transparent and Consultative Process". Additionally, there was also the Dispute and Grievance Procedure which was updated on 27 January 2016. This procedure applies to negotiation processes involving external and internal stakeholders. It also explains the Saremas Group's conflict resolution process in a flowchart. The procedure was made available at all visited estates and mill.
		Continual improvement plans (Criterion 8.1);	YES	The Saremas Group's Continuous Improvement Plan, updated on 2 January 2018 was available and verified. 13 subjects have been identified for continuous improvements, and among those identified under social impacts was to hold regular meetings with stakeholders to further enhance communication and feedback for effective engagement. Other areas identified for continuous improvement plan include water consumption, water quality, health and safety performances, and production performance, etc.
		Public summary of certification assessment report;	YES	The public summary of certification assessment report for Saremas 1 CU can be assessed through SIRIM QAS website.
		Human Rights Policy (Criterion 6.13).	YES	The Saremas Group has a Human Rights Policy dated June 2014. The policy states that the company will strive to respect and protect human rights to personal security that is free from harassment or abuse of any kind, safe, clean and healthy workplace and living environment. The policy that has been translated to Bahasa Malaysia and displayed on the notice board of the Mill and estates. No any changes of the policies during this 2018 audit.
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 Saremas Group has established a Code of Ethical Conduct which comprises 3 main principles: <ul style="list-style-type: none"> <li>• Avoiding conflict of interest</li> <li>• Avoiding misuse and/or abuse of position</li> <li>• Ensuring confidentiality of information and preventing misuse of information</li> </ul> Briefing on Code of Ethical Conduct was held at the Muster Ground in the CU.

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### 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 the applicable local, national and ratified international laws and regulations. Some relevant licences and permits were verified at the POM estates were: <ul style="list-style-type: none"> <li>• MPOB License, Energy Commission and Domestic Trade Ministry for diesel storage, Lesen untuk Menggaji pekerja bukan permastautin, Fire Certificate.</li> <li>• Factory and Machinery Act 1967</li> <li>i) <i>Person In Charge Regulation 1970</i></li> <li>ii) <i>Steam Boiler and Unfired Pressure Vessel 1970</i></li> <li>iii) <i>The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2)</i></li> <li>iv) <i>Noise Exposure Regulations 1989</i></li> <li>• EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</li> <li>• Scheduled Waste Regulations 2005</li> <li>i) Regulation 3 (Notification of scheduled waste generated)</li> <li>ii) Regulation 9 (Storage of scheduled waste &lt; 180 days)</li> <li>iii) Regulation 11 (Inventory of scheduled waste)</li> <li>• OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000</li> <li>i) Regulation 27 (health surveillance programme)</li> <li>ii) Code of Practice in Confined Space 2010 (Medical Surveillance 2 years once)</li> </ul>
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	List of applicable legal and other requirements titled "Register of Legal and Other Applicable Requirement for PBB Oil Palms Berhad (Sarawak Operation)" was made available during the audit. There was a changes to the legal register and updated in Jan 2019. The amendment included the Minimum Wages Order 2018 & Employee Insurance System Regulation 2017.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Saremas 1 CU maintained its mechanism for ensuring all the applicable legal requirements are implemented. The mechanism were by: <ol style="list-style-type: none"> <li>1. Other specific evaluation of compliance: <ul style="list-style-type: none"> <li>▪ DOSH Inspection Book (latest visit at Saremas 1 POM on 03/12/2018, Suai Estate &amp; Saremas 1 Estate on 05/09/2018)</li> <li>▪ CHRA (last assessment at Saremas 1 POM, Suai Estate &amp; Saremas 1 on 09/05/2017)</li> </ul> </li> <li>2. Within the Saremas Group, a document entitled Mechanism on Ensuring Implementation of Legal Compliance &amp; Other Requirements was established.</li> <li>3. Evaluation of compliance against the identified legal was carried out on annual basis. The latest compliance check was carried out during the conduct of the RSPO internal audit. The compliances were ensured by periodic reporting from operational units, on site visit/inspections/consultation, assessment/evaluation/audits and consultation with RSPO team and management.</li> </ol>
	2.1.4	A system for tracking any changes in the law shall be implemented.	YES	Changes to law and regulation were being monitored by the Sustainability Department at the HQ. A procedure titled as Mechanism for Ensuring Implementation of Law-System For

## RSPO PUBLIC SUMMARY REPORT

		Minor Compliance		Tracking Any Changes was available. Various sources were referred to in obtaining information about the updates of legal requirements. These includes interacting with the industrial association (such as MPOA, EMPA, SECA), attending seminar/conference, subscribing to the publisher of the law books and checking the government agencies websites. The latest legal and other requirement register was updated in Jan 2019.
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	The copies of legal ownership of the land for both Saremas 1 & Suai Estates were verified. The land was bought from Sarawak Government on 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey. Both estates were confirmed to be operating on land with correct legal status.
	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	Physical markers are available and visibly maintained along the legal boundaries. In Saremas 1 Estate, a wooden peg with red/white strip was sighted in Saremas 1 Estate and area adjacent to the "Rumah Brain". The separation of areas was made prominent with a main road crossing the area. Similar markers were available in Suai Estate. The same design of red/white strip wooden peg was sighted in field no. 083 adjacent with local people of Rumah Jayan. Physical markers were available & visibly maintained along the legal boundaries.
	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	There are currently two existing disputes; Iban and Penan Claim. Based on the audit and the records available, it was evident that legal acquisition of land has been obtained by Saremas Sdn Bhd and that compensation have been made to the two groups of claimants following negotiations and consultations.
	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	There are two existing significant land conflicts involving Saremas Sdn Bhd (as reported in 2.2.3 above). In both cases, there were evidences that attempts were made at conflict resolution. And, it can be confirmed that Saremas Sdn Bhd has followed and implemented its own conflict resolution procedures in handling land claims from the local communities before the claimants proceeded to initiate legal action.

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	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 (including neighbouring communities and relevant authorities where applicable). Minor Compliance	YES	<p><u>First Dispute (Iban claim):</u> Via a letter dated 7 February 2015, the General Manager, Group Sustainability, Wilmar International Ltd wrote to Duin anak Magak, the representative from Rumah Sugai, seeking clarifications on several aspects of the claim to clarify some discrepancies such as exact area and hectarage claimed, verification of the map used in making the claim, coordinates. No response was received from Duin anak Magak of Rumah Sugai. A Letter of Demand dated 28 April 2015 was subsequently issued against Saremas Sdn Bhd, and a reply to the Letter of Demand was issued on 18 May 2015. The matter has remained status quo since.</p> <p><u>Second Dispute (Penan claim):</u> A map indicating the area of dispute was filed by the Plaintiff together with the Writ of Summons dated 5 September 2016.</p>
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	Based on documentary records, interviews with local communities (TR Golan anak Mat, TR Tapu (Rantau) and TR Brian) and with management of Saremas Sdn Bhd, there were no evidences that Saremas Sdn Bhd has instigated violence in maintaining peace and order.
C 2.3 Use of the land for oil palm does not diminish the legal,customary or user rights of other users without their free,prior and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). Major Compliance	YES	At Suai Estate, three individuals from the neighbouring land has sought clarification on the actual boundary between Block 106 Suai Estate that separates oil palm trees that they planted, and those planted by the estate. In Nov 2016, a boundary verification exercise was carried out in the presence of the 3 land owners and 5 estate representatives. The boundary pegs by Land Survey Department were located and identified using GPS coordinates, which both parties acknowledged and agreed to abide by.
	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	YES	Following the boundary verification exercise carried out in Suai Estate (as reported in 2.3.1 above), an agreement was signed by all parties in Nov 2016, where it was agreed that the boundary between Estate Block 106 and their lands is as per GIS issued by Saremas Sdn Bhd. A copy of the agreement was sighted and verified during the audit. The local communities also agree that there will be no further boundary dispute/claim in the future. Pictures of the boundary verification exercise as well as the map showing the location of the boundary pegs were also sighted during the audit.

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		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		
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	YES	All relevant information at the Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate are made available in appropriate forms and languages. The following relevant documents were made available in Bahasa Malaysia, which is a language that every party was conversant in, were made available, sighted and verified during the audit:
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	There was evidence that in the two land disputes involving Saremas Sdn Bhd, that the Ibans and Penans were able and free to choose their own representatives to represent their claim and interests in the land disputes. During the negotiations, the Ibans were able to name their representative in their letter dated 12 Dec 2014. For the Penans, there was also evidence that they were able to appoint representatives to attend the meeting with the Saremas Group as shown in the minutes of meeting dated 25 Feb 2015. Both the groups of Ibans and Penans had appointed Messrs Harrison Ngau & Co as their solicitors

### **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	2 estates and 1 mill visited maintained to have minimum 4 years business plans called business management plan. The budget allocations at estates, include activities for operating expenditure i.e. upkeep, cultivation, harvesting & evacuation, welfare, other than that, capital expenditure, RSPO compliance, etc. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. While, provisions at mill, include the activities for milling process, general charges, RSPO compliance and capital expenditure.
	3.1.2	An annual replanting	

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		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	once a year and is incorporated in their annual financial budget. The replanting program until year 2023.
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### **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	Saremas 1 CU continued to use the established manuals i.e. Wilmar International Limited 2011 Agriculture Manual & Standard Operating Procedure For Oil Palm, Safety and Health Manual, SSOP Prosedur Operasi Kerja Selamat dan Standard Sektor Perladangan. The Agriculture Manual, established on 2007 and revised in 2011 maintained in place for estate operation such as land clearing, field upkeep, pest and disease, FFB harvesting and evacuation, soil conservation and terracing, road construction and maintenance, planting density and planting technique, palm replacement during immaturity and supplying, manuring, palm thinning and replanting.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	There were mechanism in place to check consistent implementation of procedures. Among the mechanism verified were as follows: <ol style="list-style-type: none"> <li>1. Estate Visit Report by Plantation Advisor</li> <li>2. Agronomist Report</li> <li>3. Internal audit on RSPO compliance.</li> <li>4. On site visit.</li> </ol>
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Relevant records on implementation and monitoring of Agriculture Manual etc at the CU were clearly verified. Among the records sighted were: Program sheets, Field cost books, Plantation Controller reports, Agronomic reports, Audits by Sustainability Officers, Harvesting Interval records, Rat baiting records, Fertiliser application records, Monthly Progressive Reports, scheduled wastes records, PPE Checklist etc. Most records are being maintained for more than a year and some much longer.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Saremas 1 POM had recorded the origins of all third-party sourced FFB.
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	Saremas 1 CU continued to maintain and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations as per the SOP.

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	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Saremas 1 CU continued to maintain the records of the fertiliser inputs in the Monthly Fertiliser Returns 2019. Fertiliser application for 2019 programme were in progress.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Periodic foliar sampling were carried out in Saremas 1 CU and its result formed part of the basis for the fertilizers input recommendation. Foliar sampling were carried out in 11/05/2018 and 06/04/2018 in Suai Estate and Saremas 1 Estate respectively. The analysis were carried out by third party lab. Soil maps were made available to the auditors and the soil survey was conducted on Dec 2007 by third party analyst for soil organic and carbon was carried out in accordance with the International Sustainable Carbon Certification (ISCC) requirement.
	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	The auditors observed that the application of Empty Fruit Bunch (EFB) had been carried out accordingly.
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 Saremas 1 CU. In Suai Estate the soil comprises of Bekenu, Bedup, Kechor, Kuah, Mukah, Nyalau and Semarak series. As for Saremas 1 Estate it was mainly Bekenu, Bedup, Buso, Derawan, Durian, Gong Chenak, Kechor, Kuah, and Semarak series.
	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	The management strategy for plantings on slopes had been defined in Agriculture Manual & Standard Operating Procedure For Oil Palm. It was incorporated with the company policy as a management strategy for plantings on slopes between 9 and 25 degrees.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	Saremas 1 CU continued with its program on road maintenance with the records of heavy machinery movement schedule (motor grader, backhoe and compactor) was in place to ensure that the road is accessible. Excessive surface runoff were diverted through appropriate side drains.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	NO	Though Saremas 1 CU continued to monitor the subsidence of peat, no documented water and ground cover management programme were in place. Therefore, a major non compliance MN 01 2019 was raised against this indicator.
	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	NO	No drainability assessments were conducted prior to replanting on peat in Field 48 and 49 of Suai Estate to determine the long-term viability of the necessary drainage for oil palm growing. Therefore, a minor non compliance MN 02 2019 was raised against this indicator.
	4.3.6	A management strategy shall be in place for other fragile and	YES	There were no fragile and problem soils in both the estates visited.

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		problem soils. Minor Compliance		
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	Water management plans were in place at both the estates. The main objective was to promote the efficient use of water and meet the water conservation requirements under Sarawak Water Resources Enactment 1998 and water quality criteria based on Interim National Water Standards for Malaysia. Saremas 1 CU continued to use water judiciously. Programs to minimize water usage had been conducted in the estates as evidence through immediate repair on leaks detection, water efficient landscape, ultra-low volume toilet. The facilities for harvesting rain water had been constructed in the line sites and estate complexes. Gutters, down comers and rain water collection tank had been sighted at line sites. All water supplied were treated prior to usage and fit for human consumption.
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. Major Compliance	YES	Available and sighted during audit.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations (Criteria 2.1 and 5.6). Minor Compliance	YES	Analysis of treated effluent discharge from the mill was conducted as per the license requirements and results of analysis were submitted to DOE. Results were within permissible limit.
	4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance.	YES	Process water was obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. A slight inconsistent trend was noted. This was due to rainy and el nino season.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	Saremas 1 CU continued to implement IPM as planned comprising of report of any detection of pest to the management, planting beneficial plant in the field, work program on the pest management which include monitoring pest population, cultural, biological, physical, mechanical control and pesticides usage. In order to minimize use of pesticides, the estates had planted beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia coganensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Saremas 1 CU continued to conduct training related to IPM Implementation. The training were conducted by third party and focused on good agriculture practices which include the cultural control, biological control, physical control and chemical control. It was observed that all training records had been properly filed. The records include information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
C 4.6 Pesticides are used in ways that do not endanger health or	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target	YES	Saremas 1 CU continued to use agrochemicals based on the Agricultural Manual and Standard Operating Procedure for Oil Palm for various fields operations. The manual has included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic



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the environment		pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance		names as well as the specific targets and the correct dosage of agrochemicals to be used. All chemicals usage were based on the "need to do basis" no Class I chemicals had been used. Paraquat had not been used since 2007.
	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	Records showed that pesticides were used in both estates are as listed in the chemicals hazardous to health. The records where herbicides had been used were made available to the auditors including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications. Pesticides were used only when justified and areas used are recorded in stock cards and in chemical usage sheets.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	Saremas 1 CU continued to implement Integrated Pest Management (IPM) in Saremas 1 and Suai Estates. Both estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Wilmar International Limited 2011 Agriculture Manual & Standard Operating Procedure For Oil Palm and Integrated Pest Management Plan. 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> . The beneficial plants with ratio of 60:20:20 percent. Main objective to plant the beneficial plant is to minimize use of pesticide. The IPM provided maps of beneficial plant in order to monitor the decametre ratio per ha.
	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	Saremas 1 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised by World Health Organisation as Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and no paraquat, had been used. The chemical register that been established and reviewed on 1 <sup>st</sup> April 2019 were verified by the auditors and no chemical from Class 1A or 1B or listed by the Stockholm or Rotterdam Conventions were used in the estates. Annual chemical usage that key in to the databases also showed that no such chemicals were used in the plantation.
	4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary	YES	Records showed that pesticides were handled, used and applied by trained employees. The handling of chemicals was guided by the Safety Data Sheet (SDS). Appropriate safety PPE and application equipment such as gloves, boot, apron were provided and used as per the recommendations in the

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	training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance		CHRA. Personnel such as the storekeepers, sprayers, fertilizers and rat bait handlers were trained and were known to the potential hazards and methods the chemicals should be used in a safe manner. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard. The training records sighted.
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 (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	YES	The storage of pesticides at Saremas 1 and Suai Estate was 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) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in both estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. During Site visit at all stores Saremas 1 POM, Suai Estate & Saremas 1 Estate i.e. chemical and fertilizer store, sighted relevant SDS were seen displayed. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estates. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. Triple rinsing activities continued to be implemented for empty pesticide containers.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Pesticide applications are guided by the company's document such as SSOP Manual & Agriculture Manual. The chemicals used in the Company's estates are the common chemicals used and established in the palm oil industry. Proper PPE and tools were provided to ensure that the application of pesticides were carried out appropriately and thus minimize risks and impact to health and safety.
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 is not a practice in Saremas 1CU. There was no evidence to show that such a method being used in both Saremas 1 and Suai Estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available. (see Criterion	YES	There is no associated smallholder at Saremas 1 CU. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures. Records of training were available for verification. The training included the safety aspects and usage of PPE when handling with pesticides and herbicides. Record of training was available for verification: From interviews with the staff and workers such as the storekeepers and spraying gang, it was evidence that they have been trained and understood the hazards involve and how the chemicals

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		4.8).Minor Compliance		should be used in a safe manner.
	4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). Minor Compliance	YES	Standard Operating Procedure "Labeling, Handling, Storage, Transfer and Disposal of Schedule Waste" dated in Jan 2018 has been established under Environment Management System Procedure. Disposal of waste material related to pesticide containers are being carried out as per established procedures. Triple rinsing activities continually implemented for empty pesticide container. Scheduled wastes identified included hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409), used batteries (SW102), and fertilizers bag (SW410). Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.Major Compliance	YES	The annual medical surveillance as require has been carried out accordingly. Record sighted.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	YES	Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in Saremas 1 CU.
C 4.7 An occupational health and safety plan is doc, effectively communicated and implemented.	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be doc and implemented, and its effectiveness monitored. Major Compliance	YES	Occupational health and safety Policy has been established for new revision and endorsed by the Chairman and Chief Executive Officer in April 2019. The policy had been communicated to all levels of the organization through briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy. The OSH plan was available and properly documented and monitored.
The occupational health and safety plan shall cover the following:	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	NO	The hazard identification, risk assessment and risk control (HIRARC) has been established in Feb 2018. The mill and estates had conducted risk assessment on all its operation as well as determining their control measures annually. On overall performance, OSH administrative controls implementation as well as engineering control equipment was found adequate during the assessment. Meanwhile, during site visit at FFB loading ramp Saremas 1 POM, sighted 2 external FFB drivers was not using PPE while opening the cages at the top of FFB lorries when they are working in height places. Consequently, HIRARC control measure for working in height place activities was not effectively implemented. Hence, Major NCR DA 01 2019 was raised.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work	YES	Training programme plan and carried out for the year 2019 include appropriate training on safe working practice for all categories of workers: The training programme included the various type of training such as firefighting, fire drill, exposed to high noise levels and control measure for protection of hearing and audiometric test, understanding SDS and first aid training. The above training was conducted and records were available. Mill and estates have provided appropriate PPE for all workers in their operations. PPE Issuance and replacement record "PPE Personal Record" seen at mill and estates. Used of PPE by mill operator,

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		to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance		harvesters, LF collectors and sprayers included safety helmet, gloves, safety shoes which was observed. Several safe working practice/training was conducted by Saremas 1 CU:
	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	Occupational Safety Health (OSH) Committee has been established. The OSH committee organisation chart for 2019 was available. The Mill & Estates Manager was the chairman and the Asst. Document Clerk is the secretary. OSH Committee meetings were held once in three months. The OSH Committee meeting confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> <li>▪ Passing of previous minutes and arising matters.</li> <li>▪ Accident report (Monthly Accident statistics)</li> <li>▪ Workplace inspection</li> <li>▪ Safety report and programme</li> </ul>
	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	Emergency Response Plan was established since 2008. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. During site visit, it was sighted Emergency Response Plan was available at Boiler Station, Chemical Store, Workshop and Lubricant Store. During interviews with workers it was noted that all workers understand regarding ERP. For records training for ERP refer criterion 4.8.2. First aid training conducted at and records sighted and reviewed. First Aid boxes were available at work operations in the field in all estates and mill. Site inspection evidence that first aid kit is available at all works place with complete contents. The stock of first aid box is regularly check and refill when necessary.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	Local & Foreign workers were covered by SOCSO (Pertubuhan Keselamatan Sosial).
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Saremas 1 CU already established Lost Time Incident (LTI) summary for 2018/2019. Sighted the CU has maintained and updated the LTI Summary by monthly basis. Form JKPP 8 for 2018 was submitted to DOSH in timely manner.
C 4.8 All staff, workers, smallholders and	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes	YES	Formal training programmes for 2018/2019 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Saremas 1 POM and both estates. Year 2019 Training Plan was established in January 2019. A training needs identification matrix has been established with target dates for the training to be conducted.

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contract workers are appropriately trained.		regular assessments of training needs and documentation of the programme. Major Compliance		
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Records of training conducted were available.

### **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	Saremas 1 CU has established procedure for SOP for Environmental Impact Assessment Procedure dated in Jan 2008. Among the most significant environmental receptors for mill operation were the boiler stack emission which associated with air emission, final discharge by waterways through Sg. Simbau. While, for the estate operation, the significant receptors were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandone areas.
	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	Saremas 1 CU has established "Mitigation Methods For Significant EAI", dated in Nov 2008. The plan includes the process/activity, inputs/outputs EAI and control measures. No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum 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	YES	The monitoring of the documented environmental management plans was under "Pollution Prevention Plan", established in Jan 2008. Implementation and monitoring of the documented environmental management plans will be reviewed on annual basis. The review will take into consideration the mitigation of negative impacts and promotion of positives ones such as the monitoring of buffer zone, scheduled waste management, solid waste and etc.
C 5.2 The status of rare,	5.2.1	Information shall be collated in a HCV assessment that includes	YES	The CU has conducted an HCV assessment in July 2008. The report entitled as "HCVF Scoping Assessment of Saremas 1 CU" was prepared by third party consultant. The assessment had covered

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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.		both the planted area itself and relevant wider landscape-level considerations. Major Compliance		all the HCV on RTEs species within the residual forested areas of the estates. The report also included the management and action plan. During this Surveillance Audit 4 (2019), CU's were in progress of reviewing the HCV assessment and planned to be complete in next this year, the report currently on Draft stage.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill ops, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	The HCV/RTE action plan was updated for 2019. The update included the CITES species which was found during survey from UNIMAS. Action plan included the HCV monitoring to ensure no encroachment.
	5.2.3	There shall be a programme to regularly educate the workforce about the RTE status & appr. disciplinary measures instituted in acc. with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	YES	Programmes to regularly educate the employees about the RTE species are in place. In accordance with the company rules, appropriate disciplinary measures will be taken to any employees found to capture, harm, collect or kill these species. HCV Yearly Work Plan Summary 2019 for Saremas 1 CU, including POM was made available during the audit.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>Outcomes of monitoring shall be fed back into the action plan.</li> </ul> Minor Compliance	YES	Records on monthly monitoring was verified during the audit. Observed that signage had been erected at each estate to ban hunting. The entrances to each estate had gates and guarded by the security staffs. Regular patrols had been conducted and reported on the protection of these HCV sites. The staff and workers were also consulted on this and they were aware of the responsibility to protect endangered, rare and threatened species of forest flora and fauna in their areas. There were also posters put up at all estates offices.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There was no HVC area set-asides with existing right of local communities.
C 5.3 Waste is reduced,	5.3.1	All waste products and sources of pollution shall be identified	YES	Saremas 1 CU has documented identification of all waste product and sources of pollution. The Pollution Prevention Plans 2019 were then established to mitigate applicable identified waste product

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recycled, re-used and disposed of in an environmentally and socially responsible manner.		and documented. Major Compliance		and source of pollution the plans and updated.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Saremas 1 CU not more than 180 days @ 20mt.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	Saremas 1 CU has compiled Environmental Aspects and Impacts Identification and Risk Assessment for each activity and updated every year. The last up date was made in Jan 2019. The company has also compiled an Environmental Management Plan in an effort to minimize the environmental impacts identified in Environmental Aspects and impacts identification and risk assessment.
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	Sighted "Efficiency Use of Fossil Fuel and Optimizing Renewable Energy Plan 2" with has been updated in Jan 2019. Objective of the plan to reduce diesel consumption in 2019. The action plan to reduce diesel consumption were proper maintenance of all vehicles and machineries, replace for old machineries which not economic for use and to stringent control of tractors and FFB contract lorry movement. Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data has been compiled for comparison and control for future improvement.
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	All palms in both estates were planted between the years 1996 to 2018 and as such no land preparation/replanting had taken place in all estates. The CU adhered to the policy as per the Agricultural Manual and SSOP which advocates zero burning. All previous crop were felled, chipped/shredded, shredded, windrowed and 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 Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	All palms in both estates were planted between the years 1996 to 2018 and as such no land preparation/replanting had taken place in both estates. There was no evidence of fire had been used at the visited estates. All palms were chipped and left decomposed at field.
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	Monitoring of mill gas emission was being done online using the Continuous Emission Monitoring System and supported by Ringelmann Smoke Charts. Report show evidence that the black smoke emission was within the permissible limits of DOE as verified by document made available during on site visit to the Saremas 1 POM. POME treatment, monitoring and land application was monitored, maintained and adhered to DOE requirement.
	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major	YES	Saremas 1 CU had identified emission of GHG from their operations such as emission from the fuel used in farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.

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<p>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, are developed, implemented and monitored.</p>	5.6.3	<p><b>Compliance</b></p> <p>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</p>	NO	<p>The CU had used RSPO Palm GHG version 3.0.1 Calculator as a tool to calculate the GHG emissions. The Saremas 1 CU has used option 2 full version to calculate the data. Sighted report sends to RSPO on 05/04/2019. Oil Palm planted area figure was changed from 13,832.40ha (Year 2017) to 9285.63ha (Year 2018) due to Saremas 2 Estate has been excluded from the certified unit. The input data was verified and the following were determined:</p> <table border="1" style="width: 100%; margin: 10px 0;"> <thead> <tr> <th>Description</th> <th>tCO<sub>2</sub>e/tProduct</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.91</td> <td>FFB Processed</td> <td>204459.200</td> </tr> <tr> <td>PK</td> <td>0.91</td> <td>CPO Processed</td> <td>45256.581</td> </tr> </tbody> </table> <table border="1" style="width: 100%; margin: 10px 0;"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area</td> <td>9285.63</td> </tr> <tr> <td>OP Planted on Peat</td> <td>57.0657</td> </tr> <tr> <td>Conservation (forested)</td> <td>152.20</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>172.75</td> </tr> <tr> <td><b>Total</b></td> <td><b>9667.6457</b></td> </tr> </tbody> </table> <p><b>Milling extraction rate:</b></p> <table border="1" style="width: 100%; margin: 10px 0;"> <tbody> <tr> <td>OER</td> <td>22.13 %</td> </tr> <tr> <td>KER</td> <td>2.99 %</td> </tr> </tbody> </table> <p><b>Mill Emission</b></p>	Description	tCO <sub>2</sub> e/tProduct	Production	t/yr	CPO	0.91	FFB Processed	204459.200	PK	0.91	CPO Processed	45256.581	Land Use	Ha	OP Planted Area	9285.63	OP Planted on Peat	57.0657	Conservation (forested)	152.20	Conservation (non-forested)	172.75	<b>Total</b>	<b>9667.6457</b>	OER	22.13 %	KER	2.99 %
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Own Crop		
Emission source	tCO2e	tCO2e/tFFB
POME	5894.34	0.03
Fuel consumption	842.88	0
Grid electricity utilisation	0	0
Credits	0	0
Export of excess electricity to housing & grid	0	0
Sale of PKS	0	0
Sale of EFB	0	0
<b>Total</b>	<b>6737.22</b>	<b>0.03</b>

### Plantation / field emission

Own Crop			
Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB
Land Conversion	90104.41	9.92	0.59
*CO2 Emissions from Fertiliser	8863.86	0.97	0.06
**N2O Emissions	9112.05	1.00	0.06
Fuel Consumption	2632.13	0.29	0.02
Peat Oxidation	3116.02	0.34	0.02
Sinks	0.00	0.00	0.00
Crop Sequestration	-85029.43	-9.36	-0.56
Conservation Sequestration	-1335.23	-0.15	-0.01
<b>Total</b>	<b>27463.81</b>	<b>3.00</b>	<b>0.18</b>

### Palm Oil Mill Effluent (POME) Treatment

Diverted to compost	0%
Diverted to anaerobic digestion	100%

### Diverted to Anaerobic Digestion

Diverted to anaerobic pond	10%
Diverted to methane capture (flaring)	0%
Diverted to methane capture (electricity generation)	90%

However, the data of RSPO Palm GHG version 3.0.1 Calculator on the FFB processed was incorrect. Therefore, Minor NCR DA 02 was raised.

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

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	SIA Assessment Report for Saremas 1 CU entitled "Scoping SIA Saremas 1 and 2, Segarmas and Kaminsky Estates" was prepared in 2008. The report was prepared with the participation of the relevant stakeholders, such as the estate workers and the neighbouring long-house communities. It was conducted in June 2008 by the Independent Sustainability Advisor, and remains the baseline for socioeconomic data within the Saremas Group which includes the profile of each individual estate and mill and its stakeholders, including the identification of positive and negative social impacts.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	NO	There was evidence that the assessment has been done with the participation of the affected parties as shown by the issues raised by the different stakeholders during various stakeholder consultations. These included matters such as use of land within the estates, FFB pricing, transportation for school children, job opportunities, tanks for water storage, housing conditions, price of goods at the sundry shop, conditions of the crèche, stray dog issues, drainage systems and trained qualified medical officer. However, during Surveillance audit 2019, it was found that the SIA action plan for the year 2019 has been done without participation of affected parties. Therefore, major NCR raised as MAR 01 2019.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, incl. responsibilities for implementation. Major Compliance	YES	At Saremas 1 CU, the meeting to discuss and review the Action Plan for Social Impact Assessment (2017 – 2018) was held in March 2018. It took into account inputs from the local communities, canteen operator, workers, as well as the Women & Children Committee. Based on these, the Action Plan was updated accordingly.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	NO	The Action Plan for Social Impact Assessment (2016/2018) was reviewed at least once a year with participation of affected parties, such as staff, workers, contractors, local communities (CBDC). SIA action plan was not updated in those cases where the review has concluded that changes should be made to current practices. Based on reviewed SIA action plan for the year 2019, the plan was not concluded replanting in Suai Estate and Saremas 1 Estate. Therefore, minor NCR raised as MAR 02 2019.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).	YES	There were no scheme smallholders at Saremas 1 CU. It was confirmed during the consultation with surrounding Local Communities.

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		Minor Compliance		
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	Document No: RSPO 6.2–Consultation and Communication Procedure was established and prepared by the RSPO Unit of PPB Oil Palms Bhd. This procedure used in handling internal and external communications. The CU used internal communication techniques, such as morning assembly, internal circulars and memos, notice board and posters, suggestions boxes and complaint forms. External communication was mainly carried out via email, Public Information Request (PIR), complaint and grievances form and requisition form. The CU has started to use the JCC-PS and CBDC meetings to serve as a forum to discuss issues of interest to the estates, local government agencies and local communities (long houses). In general, the CU has followed the procedure in responding to internal and external communications.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	It was evident that the CU has appointed a PIC to handle communication matters related to stakeholder and other communications. Appointment letter dated in Jan 2018 was verified during the audit.
	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	NO	General Stakeholder List dated March 2018 for Saremas 1 Estate, Suai Estate and Saremas 1 Palm Oil Mill were available, maintained and updated. The list of stakeholders includes suppliers, contractors, government agencies/service provider, neighbouring estates and local communities. The stakeholder list was last updated in March 2018. However, list of stakeholders in Saremas 1 POM and Suai Estate not included certain relevant parties such as General of Republic of Indonesia, which in Kuching, Sarawak. Minor NCR raised as MAR 03 2019.
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	In the event of a dispute, the CU will manage it through the “Dispute and Grievances Procedure” issued in August 2013. Additionally, there was also the “Whistle Blowing Policy” which was issued in August 2015 (Ver.3).
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	Based on the complaints book/form at Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate, no evidence of dispute was sighted.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables	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	This procedure titled ‘ <i>Process for Identification of Legal &amp; Customary Rights &amp; Identifying People Entitled for Compensation</i> ’ dated in July 2009 was available. Therein, specified objective standard, procedures as practiced in the organisation. There are 2 procedures as described; Establishment of legal & native customary rights & Establishment of people entitlement for compensation.
	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way,	YES	The Saremas 1 Group has developed a Dispute Resolution Procedure. Paragraph 4 stipulates the resolution process, which can be done either directly between two affected parties, or through a mediation process. Paragraph 6.4 of the document stipulates that any agreement must clearly specify, among others, detailed quantum of compensation, size of area, location of area, who will receive the compensation, and also time of delivery.

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indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		
	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	There are currently two existing disputes; Iban and Penan Claim. Based on the audit and records available, it was evident that legal acquisition of land has been obtained by Saremas Sdn Bhd and that compensation have been made to the two groups of claimants following negotiations and consultations with participation of the affected parties. The claims were made available at the company website.
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	For the Saremas Group, documentation of pay and conditions are contained in the workers' contract of employment. All the contracts sampled were bi-lingual (Bahasa Malaysia/English), and drafted in accordance with the requirements under Rule 2 of Labour (Contents of a Contract) Rules (Sarawak) 2005. The contract stipulates among others, the wage rate, working hours, overtime wage rate, latest date for payment of wages, rest day, pay rate on rest day, paid public holidays, rate for working on public holidays, paid annual leave, etc.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	The Saremas Group adopt the same employment contract format. Samples on contracts of employment both for foreign and local workers were examined at the Saremas 1 Palm Oil Mill, Saremas 1 Estate and Suai Estate. During surveillance audit 4 (2019), interview with workers at the Saremas 1 Palm Oil Mill, Saremas 1 Estate and Suai Estate confirmed that they were allowed to read the agreement, and briefed on the salient points of the contract before they appended their thumbprint and/or signature on the contracts. They were also allowed to seek clarifications on any point they did not understand.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in	YES	Housing inspections were carried out on weekly basis by members of the health and safety committee as required under Section 23(2) of the Workers' Minimum Standard of Housing and Amenities Act 1990. The inspection typically checks for cleanliness and safety of the houses. Reports of inspection were presented to the main Safety and Health Committee for information and any actions, if necessary. Visits were made to the housing complex at Saremas 1 Estate and Suai Estate. Workers

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		accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance		at the Saremas 1 Palm Oil Mill are housed within the Saremas 1 Estate housing complex. Housing, water supplies, medical, educational and welfare amenities are provided for all staff and workers in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	There are five sundry shops available within the Saremas 1 CU. Visits were made to shops and it was verified that the shops have ample supply of daily requirements such as rice, flour, eggs, sugar, milk, cooking oil, frozen meat and fish, beverages, and other daily requirements, the items are reasonably priced and affordable, and these are being monitored by the Sustainability Unit. The Sustainability Unit also monitors general cleanliness of the premises and checks on the expiry dates of items sold.
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	a) A written statement was available in " <i>Human Right Policy</i> " updated in June 2014 signed and endorsed by the Group Plantation Head and Group CSR Head. The policy included statement among others that the workers are allowed to join any registered organizations or associations.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	There were no trade unions within the Saremas Group. However, workers are represented by Workers' Representatives who were elected from among the workers themselves. The elected workers' representatives hold their office for a two-year term and sit on the Social & Welfare Committee.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The Saremas Group Child Labour Policy updated in September 2010 stipulates that it will not employ child labour as defined by the ILO Convention, i.e. work by children under the age of 12, children under the age of 15 that prevents school attendance, and children under 18 that was hazardous to the physical or mental health of the child. This Child Labour Policy is publicly available at the Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual	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	This Group policy was available signed and endorsed by both Group Plantation Head and the Group CSR Head. The policy was publicly displayed in the visited estates and mill. The Policy was affected to mainly the employees of both gender and also employees of contractors as service provider to the estates/mill. The HR Department was responsible for the effective enforcement of the Policy.
	6.8.2	Evidence shall be provided that		Based on workers' employment contracts and confirmed during interviews conducted with local and

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orientation, union membership, political affiliation, or age, is prohibited.		employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	foreign workers (both male and female) who work as FFB Grader, loose fruit collectors, general workers, nursery workers and harvesters, there was no evidence that they have been discriminated against in terms of employment, wages paid, work assignments, housing allocations and other benefits. This also is in line with the Saremas Group's Equal Opportunity Policy which prohibits discriminatory practices based on gender, race, ethnic origin, disability, sexual orientation, faith, etc.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interview with management of Saremas 1 Palm Oil Mill, Saremas 1 Estate, and Suai Estate, as well as the sighting of job application forms, medical reports, and job interview notes, there is evidence that hiring selection and promotion are based on job vacancies, skills, suitability to the job, capabilities and medical fitness. The process of selection starts with the potential candidate submitting an application for employment (either for an executive or non-executive job). The interviewer will fill up interviewer's appraisal form which is applicable to all interviewees.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	a) The policy, available in both Malay & English was aimed to provide a conducive working environment that is characterised by equality and mutual respect.
	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	Details of this compliance is described in indicator 6.9.1 above. In the policy the reproductive rights mentioned the amongst others the following: a) The right and freedom to decide the no, range of child birth. b) The right to decide on reproductive free from discrimination, forced & violence.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented & communicated to all levels of the workforce. Minor Compliance	YES	A Dispute and Grievance Procedure is available and is applicable to the Saremas Group. The purpose of this procedure was to facilitate the dispute and grievance resolution between management, growers/ millers, and employees, local communities and other affected external parties.
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	During the audit, it was verified that the current and past prices for FFB (year 2016, year 2017 until Jan – March 2018) was being displayed at the notice board near the Saremas 1 Palm Oil Mill weighbridge.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). Major Compliance	NO	Based on CBDC meeting which were held in Nov 2018, there were no discussion on explaining FFB pricing between mill and smallholders. Interview were held between auditor and 3 smallholders sampled, they were not clear on the FFB pricing. Therefore, major NCR raised as MAR 04 2019.
	6.10.3	Evidence shall be available that		Interviews were conducted with the selected transporter. The contractors have been providing their

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		all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	services for more than 10 years. Their contracts are signed annually, and it contains schedule of rates, conditions of contract, event of default, payment terms according to the volume, diesel price and distance. Consultations with contractors confirmed that they understand the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. They also confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing. Contract with suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Both FFB transporters confirmed that payments were received within a reasonable timeframe.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	Based on records, interviews and site verification, contributions made to local development were made based on the requests from the local communities.
	6.11.2	There are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	There are no scheme smallholders in the CU. However, noted that efforts are being made by the CU to improve smallholder productivity. This is confirmed by interview with TR Golan, TR Tapu and JKK Rumah Brain who confirmed that the Saremas 1 CU do provide agriculture advisory e.g. on correct ways to apply fertilizer.
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	Based on the employment contracts of workers, their records of wages, overtime payment, rest day payment and during interviews, there was no evidence of any forms of forced or trafficked labour.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Based on interviews with foreign workers all of them were aware of the types of work they would be doing once they arrived in Malaysia. The actual job undertaken was the same as what they were informed about while they were still in their home country in Indonesia. No contract substitution has therefore occurred.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	The policy titled ' <i>No deforestation, no peat, no exploitation policy</i> ' was available. The relevancy to this special labour policy was when recruitment of temporary or foreign workers are made, was stated in page 5 of the policy. Details amongst other have mentioned the following; Commitment to ensure that the rights of all people including contract, temporary and migrant workers covered are respected according to local, national and ratified international laws guided by the principles of in relation to issues of <i>child labour, forced and bonded labour, ethical recruitment and no unlawful document retention</i> .
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 Group Policy Titled <i>Human Right Policy</i> dated June 2014 was available. The policy was signed by both Group Plantation Head and Group CSR Head. The policy had a translation in Bahasa Malaysia. It is displayed on a notice board in office and at muster ground.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak		There was a Community Learning Centre (CLC) located within the premises of the Saremas 1 Estate. Four teachers were engaged by the Saremas Group to teach 120 children aged between 7 to 13 years

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	are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES	at the CLC. The children are taught the Indonesian school syllabus, and among the facilities available are 6 computers, Wi-Fi facilities, a library and a prayer room.  The teachers are accorded free accommodation within the housing quarters and their salaries are paid by the Saremas Group. The CLC provides primary level education, after which the Indonesian children are typically returned to their home country to pursue their secondary and tertiary education. There is also a children playground outside the CLC premises.
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### **Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS**

Saremas 1 CU has no plan for any new planting and new development of area. This has been observed during the visit. Furthermore, based on the information provided by the PIC i.e. as stated in document named Sarawak Area Statement, although there were lands categorized as “Unplanted LC” and “Unproductive area”, it has been confirmed that the area was not abandoned. It was reported that there were activities like chipping to prepare some area for replanting, land preparation for seedling, terracing and maintaining proper drainage system. With these activities, it showed that the land was not left out, hence it was not considered as “abandoned agricultural land”.

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

Clause	Indicators	Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: Major Compliance		
	a) Reduction in use of pesticides(Criterion 4.6);	YES	Both estates have introduced a mechanized rotor slashing weeding in all young palms possible areas to reduce the use of chemicals for spraying. The estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estates had established nurseries for beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to establish continuity in the planting of beneficial plants. In order to reduce the use of rat baits to control rats, Rat baiting was carried out only when rat damage census showed above threshold level. Both estates were committed to reduce using of chemicals and now have implemented and will continue to only spray Circles (Strip) and noxious weeds. Soft weeds and <i>Nephrolepis bisserata</i> were planted, maintained and encouraged in the inter rows. Where possible, harvester's paths were grass



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				<p>cut.</p> <p>The estates in replants with flat areas advocated that chipped palm materials be stacked in Close Ended Conservation Trenches (CECT), which will contain water, in order to minimise/prevent breeding of Rhinoceros Beetle, thus reducing chemical control. To further control the Rhinoceros Beetle, the estates used pheromone traps and had programs to cover trunk chips in replants with cover crops. EFB was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetle.</p> <p>To control the Bagworm, the estates have planted more nectariferous beneficial plants. This was evident with the presence of polybag young plants in the nurseries. This action have reduced the use of chemical. The CU also ensure efficient loose fruit collection and expedite circle raking to avoid VOPs.</p>
b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	The CU maintained efforts to improve continuously its environmental management. Among the relevant plans and measures were: reduction of diesel usage / GHG emission, reduction of POME generation, maintain water quality, reduce soil erosion, reduce usage of chemical, reduce land contamination, improve soil fertility, reduce waste, installation of biogas plant.	
c)	Waste reduction (Criterion 5.3);	YES	Among the type of wastes are agricultural organic wastes, rubbish, used oils, used batteries, empty pesticide containers, clinical waste, scrap iron, wastewater, etc. Non-reusable empty chemical containers were disposed as per relevant requirements of scheduled wastes. Reusable agrochemical containers were used for collecting of triple-rinsing wastewater. Scheduled wastes were labelled with relevant information and hazard sign, and disposed to DOE's licensed contractor.	
d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	The CU continued to establish and implement GHG emission reduction plan. Among the plan implemented were, installation of biogas plant to generate electricity for housing complex, and periodical maintenance of tractor and power generator, application of organic material (biomass) as fertiliser. The biogas plant at Saremas 1 POM captured methane from ETP for use as fuel in the biogas engine to generate electricity. This activity has further reduced the GHG emissions.	
e)	Social impacts (Criterion 6.1);	YES	Social impacts are constantly updated based on inputs received from stakeholder consultations/meetings. The plan for continuous improvement as verified in the social action plan 2018 will be implemented as agreed during the meetings such as upgrading quarters, kindergarten, Humana and maintenance of village road. Capex 2018 shows planning of 8 new workers house (H-Type) and new Community Learning Centre (CLC) to be constructed in Saremas 1 CU. Currently, the construction of the new <i>Surau</i> is on-going.	
f)	Encourage optimising the yield of the supply base	YES	Saremas 1 CU is part of a well-established organisation, PPB Oil Palms Berhad. Thus, the yield performance has always been the top priority in ensuring long-term economic and financial viability. Various efforts had been made to optimise the yield of the plantation such as : Maximising crop recovery, Minimizing crop losses, Optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), Maintaining soil fertility, Selection of planting material such as the clonal material, Empty fruit bunches mulching at mature and immature areas, Organized frond stacking, Progressive pruning, Maintaining good agriculture practice, Avoid blanket spraying and allowed for natural vegetation as to improve soil moisture.	

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### RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

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	Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.
	(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	Details of the Time Bound Plan described as per attachment 7.
	(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	Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment 7.
4.5.4  Requirements for	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3.	NO	Sighted internal audit assessment report has been carried out for clause 4.2.4 (e)-(h) of certification system for units such as:

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uncertified management units:	Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		<u>Indonesia Units</u> <ul style="list-style-type: none"> <li>- Pt. Agrindo Indah Perkasa on June 2018</li> <li>- Ksu Mutiara Bosa Sikilang on June 2018</li> <li>- Kud Damai Sejahtera on June 2018</li> <li>- Kud Kapar on June 2018</li> <li>- Koperasi Karya Makmur Pahirangan on February 2019</li> <li>- Koperasi Mamur Sejahtera on January 2019</li> <li>- Kud Permata Sawit Maligi on June 2018</li> <li>- Kud Rantau Pasaman Sasak on June 2018</li> <li>- Pt. Buluh Cawang Plantation on June 2018</li> <li>- Pt. Daya Landak Plantation on June 2018</li> <li>- Pt. Indoresin Putra Mandiri on June 2018</li> <li>- Pt. Putra Indotropical on June 2018</li> <li>- Pt. Pratama Prosentindo on June 2018</li> <li>- Pt. Agronusa Investama – PAHAUMAN on June 2018</li> <li>- Pt. Sarana Titian Permata Pom 2 on January 2019</li> <li>- Koperasi Tuah Jubata on February 2019</li> </ul>
	(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;	NO	
	(c) Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	NO	
	(d) Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	NO	<u>Arica Units</u> <ul style="list-style-type: none"> <li>- Biase Plantation Limited (BPL) on February 2019</li> <li>- Eyop Industries Limited (EIL) on february 2019</li> </ul>
	(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:	NO	<u>Malaysia Units</u> <ul style="list-style-type: none"> <li>- Jebawang Sdn Bhd – Laba Utama on April 2019</li> <li>- Suburmas Plantation Sdn Bhd on April 2019</li> </ul> <p>However, supporting documentation for self - declaration was inadequate. Evidences &amp; document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc was not adequate in the report for all uncertified management units.</p>
	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	NO	<p><b>Refer to NCR Minor MZK 01 2019.</b></p>
	<ul style="list-style-type: none"> <li>• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	NO	
	<ul style="list-style-type: none"> <li>• Desktop study e.g. web check on relevant complaints</li> </ul>	NO	

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		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	NO	
<p>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.</p>		<p>No additional indicators</p>	Yes	<p>The copies of legal ownership of the land for both Saremas 1 &amp; Suai Estates were verified. The land was bought from Sarawak Government on 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey.</p>

Note:

- 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;
- 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
4.7.2 DA 01 2019 (1/2)	Major	<p>Findings: Certain operation/activities has not been risk assessed.</p> <p>Objective evidence: Certain operation/activities at Saremas 1 Estate and Suai Estate has not been risk assessed and updated in the HIRARC:</p> <ul style="list-style-type: none"> <li>i. Road maintenance operation</li> <li>ii. Rubbish collection</li> <li>iii. FFB ramp operation</li> <li>iv. P&amp;D census operation</li> <li>v. Office activities</li> <li>vi. Crèche activities</li> <li>vii. Workshop activities</li> <li>viii. CLC activities</li> <li>ix. Building Construction activities (Saremas 1 Estate)</li> </ul>	<p>Management has conducted risk assessment with safety committee and relevant parties such as contractors.</p>	<p>Auditor has received copy of HIRARC which include activities/operation as follows:</p> <ul style="list-style-type: none"> <li>i. Road maintenance operation</li> <li>ii. Rubbish collection</li> <li>iii. FFB ramp operation</li> <li>iv. P&amp;D census operation</li> <li>v. Office activities</li> <li>vi. Crèche activities</li> <li>vii. Workshop activities</li> <li>viii. CLC activities</li> <li>ix. Building Construction activities (Saremas 1 Estate)</li> </ul> <p><b>Status: Closed</b></p>
4.7.2 DA 01 2019 (2/2)	Major	<p>Findings: HIRARC control measure for working in height place activities was not effectively implemented.</p> <p>Objective evidence: During site visit at FFB loading ramp Saremas 1 POM, sighted 2 external FFB drivers was not using PPE while opening the cages at the top of FFB lorries as they are working in height places.</p>	<p>Saremas 1 POM has conducted training on safety and health lead by Sustainability Team and mill team for the contractor (FFB transporter representatives) on 10/5/2019. This training is to ensure the contractor comply with Wilmar policy on safety and health.</p>	<p>Auditor has received copy of the training report held on 10/5/2019. The training mainly on working at height, basic safety and health at estate and mill, road safety at Wilmar and company policy on safety and health.</p> <p><b>Status: Closed</b></p>
5.6.3 DA 02 2019	Minor	<p>Findings: The data reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools was incorrect.</p> <p>Objective evidence: The data of RSPO Palm GHG version 3.0.1 Calculator on FFB processed 204459.20mt was incorrect with actual mill FFB process data</p>	<p>FFB process data was corrected and review RSPO Palm GHG Version 3.0.1 calculator was updated with the corrected data on 12/4/2019.</p>	<p>Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit</p> <p><b>Status: Open</b></p>

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		204559.370mt.		
2.2.2 MZK 02 2019	Minor	<p>Findings: The physical markers was not visibly maintained along the legal boundaries.</p> <p>Objective evidence: Physical marker alongside Saremas 1 Div 2 Block 29 with Mega Jutamas was not visible along the legal boundaries.</p>	Management has erected physical boundary markers along Saremas 1 Division 2 Block 29.	<p>Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit</p> <p><b>Status: Open</b></p>
4.5.4 – Requirement for uncertified management unit MZK 01 2019	Minor	<p>Findings: Supporting documentation for self - declaration was in adequate.</p> <p>Objective evidence: Evidences &amp; document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc was not available for all uncertified management units.</p>	The management currently progressing to provide the evidences and documents reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc.	<p>Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit</p> <p><b>Status: Open</b></p>
4.3.4 MN 01 2019	Major	<p>Findings: No documented water and ground cover management programme were available at Suai Estate.</p> <p>Objective evidence: It was found that Block 040 and 041 of Suai Estate do not conduct drainability assessments prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p>	Management has do the ground water management at block 040 and block 041 and monitoring the subsidence of peat soils.	<p>Corrective Action Plan Accepted, However, the implementation of corrective action plan will be verified during next audit</p> <p><b>Status: Closed</b></p>
4.3.5 MN 02 2019	Minor	<p>Findings: Drainability assessments were not available at Suai Estate</p> <p>Objective evidence: It was found that Block 040 and 041 of Suai Estate do not conduct drainability assessments prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p>	Management currently in progress of conducting drainability assessments for the Block 040 and Block 041.	<p>Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit.</p> <p><b>Status: Open</b></p>

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<p>6.1.2 MAR 01 2019</p>	<p>Major</p>	<p>Findings: The SIA action plan for the year 2019 has been done without participation of affected parties.</p> <p>Objective evidence: Based on reviewed SIA action plan for the year 2019 for Suai Estate and Saremas 1 Estate the assessment has been done without participation of longhouses i.e Rh Baki, Rh Jalin, Rh Sabang and Rh Golan.</p>	<p>Management has conducted the stakeholder meeting on 8/5/2019 on the SIA action plan for the stakeholder i.e Rh Baki, Rh Jalin, Rh Sabang and Rh Golan.</p>	<p>Auditor has received copy of "Minit Mesyuarat Jawatankuasa Berasaskan Pembangunan Masyarakat / Community Based Development Committee (CBDC) ke 1 Bagi Tahun 2019" which were held on 8/5/2019.</p> <p><b>Status: Closed</b></p>
<p>6.1.4 MAR 02 2019</p>	<p>Minor</p>	<p>Findings: SIA action plan was not updated in those cases where the review has concluded that changes should be made to current practices.</p> <p>Objective evidence: Based on reviewed SIA action plan for the year 2019, the plan was not concluded replanting in Suai Estate and Saremas 1 Estate.</p>	<p>Management has reviewed the SIA and included replanting in Suai Estate and Saremas 1 Estate.</p>	<p>Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit.</p> <p><b>Status: Open</b></p>
<p>6.2.3 MAR 03 2019</p>	<p>Minor</p>	<p>Findings: A list of stakeholders was not included certain parties.</p> <p>Objective evidence: List of stakeholders in Saremas 1 POM and Suai Estate not included General of Republic of Indonesia, which in Kuching, Sarawak.</p>	<p>The management has updated list of stakeholders to included Consulate General of Republic of Indonesia, which in Kuching, Sarawak.</p>	<p>Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit.</p> <p><b>Status: Open</b></p>
<p>6.10.2 MAR 04 2019</p>	<p>Major</p>	<p>Findings: There was no evidence of the millers explained of FFB pricing and pricing mechanisms for FFB to the stakeholders.</p> <p>Objective evidence: Based on CBDC meeting which were held on 30 November 2018, there were no discussion on explaining FFB pricing between mill and smallholders. Interview were held between auditor and 3 smallholders sampled, they were not clear on the FFB pricing.</p>	<p>Management has conducted training on 8/5/2019 on FFB pricing to the smallholder and simple note has been given to all participant.</p>	<p>Auditor has received copy of the training report held on 8/5/2019. The training mainly on FFB pricing method and calculation.</p> <p><b>Status: Closed</b></p>

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Attachment 5

### RSPO SUPPLY CHAIN : AUDIT CHECKLIST

#### SECTION A : GENERAL INFORMATION

1. File Reference No.	: ES11320001
2. Name of facility/ site(s) /entity(ies)	: PPB Oil Palm Berhad – Saremas 1 POM
3. Site Location (single site/multisite/Group)	: KM 115, Bintulu-Miri Road, 97008 Bintulu, Sarawak
4. SC model	: Mass Balance
5. Type of entity	: Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End-product manufacturer  <i>For oleochemicals and its derivatives, please check the conversion factor against the “RSPO Rules for Oleochemicals and its Derivatives” dated 1st December 2016</i>
6. RSPO Member Number	: 2-0017-05-000-00
7. Annual summary records of certified oil palm products purchased and claimed	: Actual for last year for period of March 2018 until February 2019 CPO Projected: 37,900.50 mt PK Projected: 6,546.45 mt CPO Claim as Mass Balance: 6,165.07 mt CPO Claim under another scheme: 27,566.00 mt CPO Claim as Non-RSPO: 0 mt PK Claim as Mass Balance: 4,418.04 mt PK Claim as Non-RSPO: 0 mt

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

	Requirements	Remarks
	<b>Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT</b>	
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	N/A as this audit is a surveillance audit.
	<b>Audit Process Requirements – SURVEILLANCE AUDIT</b>	



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5.3.26	<p>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.</p> <p>In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.</p>	<p>Saremas 1 POM Organizational, management systems and the operational systems, 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.</p> <p>Sighted Saremas 1 palm oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Procedure dated 1/1/19. Among the documented requirements related to Mill Supply Chain definition, delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers, Internal Audit, Management Review.</p> <ol style="list-style-type: none"> <li>1. Mill Supply Chain Definition</li> <li>2. Management Representative</li> <li>3. Purchasing and Goods In</li> <li>4. OutSourcing</li> <li>5. Sales and Goods Out</li> <li>6. Registration of Transactions</li> <li>7. Training</li> <li>8. Record Keeping</li> <li>9. Claims</li> <li>10. Complaints Procedure</li> <li>11. Internal Audit</li> <li>12. Management Review</li> <li>13. Supply Chain Model – Identity Preserved</li> <li>14. GHG Tabulation for RSPO Certified POM</li> </ol>
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### SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
<b>1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>	
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.	Saremas 1 POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable due to Saremas 1 POM was a processing facility.

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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 membership no : 2-0017-05-000-00 Registered under : SAREMAS 1 POM
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Saremas 1 POM scope of certification
2	<b>Supply chain model</b>	
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.	Saremas 1 POM has aware on the need to downgrading of supply chain model. However, this indicator was not applicable since this POM use MB model.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Saremas 1 POM has continued to maintain MB model.
3	<b>Documented procedures</b>	
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:	Saremas 1 POM Organizational, management systems and the operational systems, 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. Sighted Saremas 1 palm oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Procedure dated 1/1/19. Among the documented requirements related to Mill Supply Chain definition, delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, There was no evidence that Saremas 1 POM seeking certification outsources activities to independent third parties.
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Supply chain procedure was developed to follow RSPO SCCS 2017 namely RSPO Supply Chain Certification Procedure dated 1/1/19. The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	The Chief Clerk has the overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Saremas 1 POM sighted appointment letter dated 1/3/19. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization;	RSPO internal audit was conducted in Dec 2018 by internal lead auditor. The internal audit has follow the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There were no nonconformance report (NCR) were raised

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	<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>by auditor.</p> <p>Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>
<b>4</b>	<b>Purchasing and goods in</b>	
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number.</li> </ul> <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>	<p>Saremas 1 POM had continued received FFB supply from own company estate namely Saremas 1 Estate, and Suai estate and Outsider Crop consist of 7 Grower and 64 Smallholder.</p> <p>Sighted FFB consignment note for sampled goods purchased. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight.</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).	Yes.
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.	Saremas 1 POM has registered in IT platform. Registered Under name: Saremas 1 POM.

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c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcement	Saremas 1 POM had continued received FFB supply from own company estate namely Saremas 1 Estate, and Suai estate and Outsider Crop consist of 7 Grower and 64 Smallholder.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Saremas 1 POM has established Weighbridge Nett to control incoming material and outgoing products. The FFB supplier & Product buyer & its vehicle registration has to be registered in the system prior weighing. RSPO Supply Chain Certification procedure dated 1/1/19 appendix A has indicate the mechanism to handle nonconforming material/documents such as validity of certificate supplying estate.
<b>5</b>	<b>Outsourcing activities</b>	
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>	There were 5 outsource company CPO and PK transporters. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.
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"> <li>a) The site has legal ownership of all input material to be included in outsourced processes;</li> <li>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.</li> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>a) There are 5 outsource company CPO and PK transporter.</li> <li>b) There was contract document between Saremas 1 POM and the transporters.</li> <li>c) The RSPO Supply Chain procedure has described on outsource activity.</li> <li>d) 19/2/19 – during stakeholder meeting there are several CPO Transporter attended the meeting which highlight on the RSPO issue.</li> </ul> <p>Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</p>
5.3	The site shall record the names and contact details of all contractors	List of contact person for both transporters were made available and up-to-date.

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	used for the processing or production of RSPO certified materials.	
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.	No new contractors used for the processing or production of RSPO certified materials.
<b>6</b>	<b>Sales and goods out</b>	
6.1	<p>The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number;</li> <li>• A unique identification number.</li> </ul>	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Saremas 1 POM. Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Saremas 1 POM's RSPO certificate number and product name together with model used were stated in the delivery documents.
<b>7</b>	<b>Registration of transactions</b>	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• are supply chain actors between the mill and final refinery;</li> <li>• take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and</li> <li>• are part of the supply chain of RSPO Certified Sustainable oil palm products</li> </ul> <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>	Saremas 1 POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.
<b>8</b>	<b>Training</b>	
8.1	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.	Training plan has included the RSPO Supply chain training scheduled in Dec 2019 for staff & workers.

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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>Training was conducted for workers in Dec 2018 by the Sustainability PIC. Attendance list &amp; photograph was seen.</p> <p>The lead auditor for RSPO internal audit has had the experience regarding SCCS almost 3 years and already trained by internal personnel.</p>
<b>9</b>	<b>Record keeping</b>	
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.	Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.
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 was maintained for more than 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.
<b>10</b>	<b>Conversion factors</b>	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ). 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 ( <a href="http://www.rspo.org">www.rspo.org</a> ).	Mill OER & KER applied.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Based on actual monthly result.
<b>11</b>	<b>Claims</b>	
11.1	The site shall only make claims regarding the use of or support of	No claim been made.

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	RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	
<b>12</b>	<b>Complaints</b>	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Documented procedure has established to address collecting and resolving the complaint. Sighted in the RSPO Supply Chain Certification Procedure clause 10. Complaint Procedure.
<b>13</b>	<b>Management review</b>	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted once a year
13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO SCCS</li> <li>• Customer feedback</li> <li>• Status of preventive and corrective actions</li> <li>• Follow-up actions from management reviews</li> <li>• Changes that could affect the management system</li> <li>• Recommendations for improvement</li> </ul>	<p>Management review meeting dated in Jan 2019 (combine RSPO SC and ISCC)</p> <ul style="list-style-type: none"> <li>• Internal audit – 0 NCR</li> <li>• Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.</li> <li>• Previous meeting – was highlighted</li> <li>• Changes</li> <li>• Recommendation for improvement – improve the established system</li> </ul>
13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes</li> <li>• Resource needs</li> </ul>	<p>Recommendation for improvement</p> <p>Recourse sufficient.</p>

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### RSPO Supply Chain at the Saremas 1 palm oil mill – Mass Balance Model – Module E

Item No	Requirement NOV 2014	Findings
<b>E.1</b> E.1.1	<b>Definition</b> 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	<b>Actual (March 2018 – February 2019)</b>  <div style="text-align: right; margin-right: 20px;"><u>MT</u></div> a) FFB Received <span style="float: right;"><b>203,721.20</b></span>  RSPO           151,970.16  FFB Processed <span style="float: right;"><b>203,451.98</b></span>  RSPO           151,970.16  b) Delivery of CPO <span style="float: right;"><b>33,933.01</b></span>  RSPO(MB)   6,165.07  Other Schemes 27,566.00  Delivery of PK <span style="float: right;"><b>4,417.55</b></span>  RSPO(MB)   4,418.04  Other Schemes   0
<b>E 2</b> E..2.1	<b>Explanation</b> Estimate total tonnage of CPO and PK potentially produce in a year	<b>Projection (March 2019 – February 2020)</b>  <div style="text-align: right; margin-right: 20px;"><u>MT</u></div> (1) FFB Received <span style="float: right;"><b>238,483.33</b></span>  RSPO           179,083.33  Non-RSPO       59,400.00  (2) FFB Processed <span style="float: right;"><b>238,483.33</b></span>  RSPO           179,083.33  Non-RSPO       59,400.00



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		<p>(3) CPO Production <span style="float: right;"><b>40,122.84</b></span></p> <p>(4) PK Production <span style="float: right;"><b>6,368.82</b></span></p>
E. 2 E 2.2	<p><b>Explanation</b></p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim.</p>	Saremas 1 POM has a registered RSPO e-Trace.
E 3 E 3.1	<p><b>Documented procedures</b></p> <p>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:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard.</p>	<p>a) Saremas 1 POM Organizational, management systems and the operational systems, 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.</p> <p>Sighted Saremas 1 palm oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Procedure dated 1/1/19. Among the documented requirements related to Mill Supply Chain definition, delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers, Internal Audit, Management Review.</p> <p>b) The Chief Clerk has had overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Saremas 1 POM sighted appointment letter dated 1/3/19. Interview with sustainability committee member, mill manager, assistant mill manager &amp; weighbridge operator was confirmed they are understood the supply chain requirements.</p>
E 3.2	The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.	<p>Saremas 1 palm oil mill has continued to implement documented procedure 'SOP RSPO Supply Chain Certification Procedure, Clause 3. Purchasing and Goods In related receiving and processing respectively.</p> <p>The processing of RSPO certified FFB is carried out based on the fruits availability. Since the mill are processing RSPO Mass Balance FFB, it is not necessary for SAREMAS 1 POM to physically segregate the certified FFBs during the receiving and processing. The production of certified CPO and PK are traceable through the daily production record which keep an account on the quantity of certified FFBs being processed and the CPO and PK being produced.</p>
E.4 E.4.1	<p><b>Purchasing and goods in</b></p> <p>The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>All certified FFB came from Saremas 1 CU estates and non-certified FFB come from independent FFB suppliers. All delivery documents of certified FFB were verified to ensure the certified status of the FFB. Volumes of certified and non-certified FFBs received by the mill had been properly recorded and monitored. Refer to table attached. All purchasing and sales activities were handled by Sustainability and Supply Chain Department and Wilmar PPBOP Kuala Lumpur (HQ).</p>
E 4.2	The site shall inform the CB immediately if there is a projected overproduction.	<p>The SOP RSPO Supply Chain Procedure on Clause 3. Purchasing and Goods In, requires the Mill Manager to inform the Sustainability Department if there would be a projected overproduction of RSPO-certified CPO or PK. Such information shall also be conveyed to the relevant certification body. There was no overproduction observed since last audit.</p>

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<b>E.5</b>	<b>Record keeping</b>	Available.
E.5.1	<p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock)</p>	
<b>E 5.2</b>	<p>In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.</p>	<p>Outsource activities only for CPO &amp; PK transportation. The contracts were handled by the Contract Department at Wilmar HQ in Bintulu Office. There were no outsourcing activity to an independent palm kernel crush with regards to the processing of the material or product.</p>
<b>E.4</b>	<b>Sales and good out</b>	<p>The mill has continued to implement documented procedure related to sales of CPO and PK to Bintulu Edible Oils Sdn. Bhd. All CPO and PK sale to Bintulu Edible Oils Sdn.Bhd. (company own refinery). Sighted the sales invoices issued for RSPO certified product has included name and address of the refinery; date deliver; product description, supply chain model i.e. Mass Balance, quantity of the products delivered as well as transportation documentation such as Borang MPOB L3, Saremas 1 mill Weighbridge ticket, Kebenaran Mengangkut /arahan penghantaran from the transporter company, Deliver order from Saremas 1 palm oil mill.</p>
E.4.1	<p>The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:</p> <p>a) The name and address of the buyer;</p> <p>b) The date on which the invoice was issued;</p> <p>c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)</p> <p>d) The quantity of the products delivered;</p> <p>e) Reference to related transport documentation.</p>	
<b>E.5</b>	<b>Training</b>	<p>Training was conducted for workers in Dec 2018 by the Sustainability PIC. Attendance list &amp; photograph was seen.</p>
E.5.1	<p>The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems.</p>	
<b>E.6</b>	<b>Claims</b>	<p>As to date Saremas 1 POM only claim CSPO and CSPK.</p>
E.6.1	<p>The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims.</p>	

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Attachment 6

### VERIFICATION OF NON-CONFORMITIES DURING LAST SURVEILLANCE ASSESMENT AT Saremas 1 CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.1.2 NCR MNAJ 01 2018	Minor	<p>Findings: There was no evidence to show that consistent implementation of Chapter 7 Wilmar International Limited Agriculture Manual &amp; SOP For Oil Palm</p> <p>Objective evidence: Suai Estate: Harvesters in Block 005 (2001) do not consistently implement the harvesting standards as they do not wear safety glasses while harvesting.</p>	<p>- The new safety glass already arrived and distribute the relevant workers.</p> <p>- Suai estate has created the form for monitoring usage of PPE for workers. The Staff and Assistant will do every morning checking and spot-check in the field for usage of PPE. Penalty will impose if they not used it</p> <p>Correction: Safety Glass received and distributed to all Harvester on 28/4/2018.</p>	<p>Fields 048, 062, 072 in Saremas Estate and 005, 099, 057 in Suai Estate were visited with work allocate i.e harvesting, manuring and spraying respectively showing the workers were adhered to the safety SOP such as PPE attire and emergency procedures. The auditors also verified that the harvesters in Block 005 (2001) of Suai Estate did consistently implement the harvesting standards as they wore safety glasses while do the harvesting job. Thus, previous minor NCR <b>MNAJ 01 2018</b> was closed.</p> <p><b>Status: Closed</b></p>
4.7.3 NCR MAR 01 2018	Major	<p>Findings: Appropriate protective equipment not available to all workers at the place of work to cover all potentially hazardous operations.</p> <p>Objective evidence: Suai Estate – Steep stairs at workshop and improper guarding monkey ladder at water treatment plan. Saremas 1 POM – Rubber shoes wearing by two (2) workers instead of safety shoes.</p>	<p>Suai Estate - The old steep stairs has been dismantle and the new safe steep stairs has been install at the workshop. And monkey ladder guarding already reinstall at Water treatment plant (refer Picture)</p> <p>POM - The new safety shoes already arrive and distribute to workers who affected. (Refer picture). POM has created the form for monitoring usage of PPE for workers. The Staff and Assistant will do every morning checking and spot-check in the Mill for usage of PPE. Penalty will impose if they not used it.</p> <p>Correction: Safety Shoe has received and distributed to workers on 21/5/2018.</p>	<p>Mill and estates have provided appropriate PPE for all workers in their operations. PPE Issuance and replacement record "PPE Personal Record" seen at mill and estates. Used of PPE by mill operator, harvesters, LF collectors and sprayers included safety helmet, gloves, safety shoes which was observed.</p> <p>Several safe working practice/training was conducted by Saremas 1 CU:</p> <p><b>Saremas 1 POM:</b></p> <ul style="list-style-type: none"> <li>▪ Fire Drill Training – 11/03/2019</li> <li>▪ Chemical Handling Training – 14/02/2019</li> <li>▪ PPE &amp; Safety Training – 31/01/2019</li> <li>▪ Confine Space Training – 16/02/2019</li> </ul>

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			<p><b>Suai Estate:</b></p> <ul style="list-style-type: none"> <li>▪ Fire Drill Training – 28/02/2019</li> <li>▪ PPE Awareness Training – 31/01/2019, 20/02/2019</li> <li>▪ Chemical Handling Training – 14/02/2019</li> </ul> <p><b>Saremas 1 Estate:</b></p> <ul style="list-style-type: none"> <li>▪ Fire Drill Training – 15/02/2019</li> <li>▪ PPE Awareness Training – 04/01/2019, 21/01/2019, 12/02/2019</li> <li>▪ Chemical Handling Training – 25/01/2019</li> </ul> <p>During site visit at workshop Suai Estate, sighted the estate has design the new steep stair which safer and the monkey ladder guarding at the WTP has been reinstalled. Safety shoes were also provided for FFB ramp workers at Saremas 1 POM. <b>Therefore, previous NCR MAR 01 2018 was satisfactory closed.</b></p> <p><b>Status: Closed</b></p>
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Attachment 7

### Time Bound Plan for Wilmar International Limited (Malaysia)

No.	Company	Estate	Mill	Location	Certification year	Status
1	PPB Oil Palms Berhad	Sapi 1, Sapi 2, Kiabau	Sapi Palm Oil Mill	Sandakan	2008	Certified
2	PPB Oil Palms Berhad	Reka Halus	Reka Halus Palm Oil Mill	Sandakan	2008	Certified
3	PPB Oil Palms Berhad	Sabahmas	Sabahmas Palm Oil Mill	Lahad Datu	2008	Certified
4	PPB Oil Palms Berhad	Saremas 1, Suai	Saremas 1 Palm Oil Mill	Bintulu	2010	Certified
5	PPB Oil Palms Berhad	Saremas 2, Kaminsky, Segarmas	Saremas 2 Palm Oil Mill	Bintulu	2010	Certified
6	PPB Oil Palms Berhad	Ribubonus	Ribubonus Palm Oil Mill	Sandakan	2010	Certified
7	PPB Oil Palms Berhad	Terusan 1, Terusan 2, Rumidi	Terusan Palm Oil Mill	Sandakan	2010	Certified
8	PPB Oil Palms Berhad	Hibumas 1, Hibumas 2, Jebawang, Sekar Imej, Sapi Sugut, Sri Kamusan	Sri Kamusan Palm Oil Mill	Sandakan	2011	Certified
9	PPB Oil Palms Berhad	Suburmas	Suburmas Palm Oil Mill	Bintulu	2021	To be certified
10	PPB Oil Palms Berhad	Labau Utama Sdn Bhd -Jebawang Sdn Bhd	Sri Kamusan Palm Oil Mill	Sandakan	2022	To be certified

### Time Bound Plan for Wilmar International Limited (Indonesia-Kalimantan)

No.	Company	Mill	Estate	Location	Certification year	Status
1	PT Mustika Sembuluh	PT Mustika Sembuluh mill 1	Mustika Sembuluh 1, Mustika Sembuluh 2, Kerry Sawit Indonesia 1, Sarana Titian Permata 1, Sarana Titian Permata 2, , KUD Bitu Maju Bersama	Central Kalimantan	2010 (KUD bersertifikat di tahun 2014)	Certified
2	PT Kerry Sawit Indonesia	PT Kerry Sawit Indonesia I mill	Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3, KUD Sejahtera Bersama, KUD Kosudra,	Central Kalimantan	2011	Certified
3	PT Bumi Sawit Kencana	PT Bumi Sawit Kencana mill	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2, Karunia Kencana Permaisejati 1	Central Kalimantan	2013	Certified
4	PT Sarana Titian Permata	PT Sarana Titian Permata 2 mill	Sarana Titian Permata 2, Sarana Titian Permata 3	Central Kalimantan	2020	Main Assessment

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6	PT Agro Nusa Investama 1 (Sambas)	PT Agro Nusa Investama 1 (Sambas) mill	ANI Sambas	West Kalimantan	2012	Certified
5	PT Mustika Sembuluh	PT Mustika Sembuluh 2 mill	Mustika Sembuluh 1, Mustika Sembuluh 3, Bumi Sawit Kencana 1	Central Kalimantan	2015	Certified
6	PT Mentaya Sawit Mas	PT Mentaya Sawit Mas mill	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2, Bumi Sawit Kencana 2	Central Kalimantan	2015	Certified
7	PT Kerry Sawit Indonesia	PT Kerry Sawit Indonesia 2 mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Mustika Sembuluh 2, KUD Tabiku Makmur, KUD Karya Bersama	Central Kalimantan	2015	Certified
8	PT Rimba Harapan Sakti	PT Rimba Harapan Sakti mill	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2, PT. Kerry Sawit Indonesia 3	Central Kalimantan	2015	Certified
9	PT Karunia Kencana Permaisejati	PT Karunia Kencana Permaisejati mill	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	Central Kalimantan	2017	Certified
10	KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	PT Kerry Sawit Indonesia 1,2 mill	KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	Central Kalimantan	2020	Re-Audit
11	PT Bumipratama Khatulistiwa	PT Bumipratama Khatulistiwa mill	Bumi Pratama Khatulistiwa, Buluh Cawang Plantation	West Kalimantan	2016	Certified
12	PT Agro Nusa Investama (Landak)	PT Agro Nusa Investama (Landak) Mill	Agronusa Invenstama 2 (Landak), Pratama Procentindo	West Kalimantan	2020	To be certified
13	PT Agro Palindo Sakti 2	PT Agro Palindo Sakti 2 mill	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoresin Putra Mandiri	West Kalimantan	2020	To be certified
14	KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	PT Agro Nusa Investama 1 (Sambas)	KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	West Kalimantan	2017	<b>Re-Audit</b>

### Time Bound Plan for Wilmar International Limited (Indonesia-Sumatera)

No.	Palm Oil Mill/Estate	Mill	Estate	Location	Certification year	Status
1	PT Perkebunan Milano	PT Perkebunan Milano Mill	Sei Daun, Batang Saponggol, Merbau	North Sumatra	2009	Certified
2	PT Tania Selatan	PT Tania Selatan Mill	Burnai Timur, Burnai Barat	South Sumatra	2010	Certified

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3	PT Kencana Sawit Indonesia	PT Kencana Sawit Indonesia Mill	Kencana Sawit Indonesia,	West Sumatra.	2010	Certified
4	PT AMP Plantation	PT AMP Plantation Mill	AMP I, AMP II, AMP III, AMP IV, Primatama Mulia Jaya, Karya Agung Megah Utama, Perkebunan Anak Negeri Pasaman, Koperasi Tompek Tapian Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ	West Sumatra	2011 (KUD bersertifikat di tahun 2014)	Certified
5	PT Buluh Cawang Plantations	PT Buluh Cawang Plantations Mill	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	South Sumatra	2012	Certified
6	PT Gersindo Minang Plantations	PT Gersindo Minang Plantations Mill	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	West Sumatra	2012	Certified
7	PT Daya Labuhan Indah	PT Daya Labuhan Indah Mill	Wonosari, Sei Deras, Cabang Dua	North Sumatra	2013	Certified
8	PT Agro Palindo Sakti	PT Agro Palindo Sakti Mill	Agro Palindo Sakti	South Sumatra	2014	Certified
9	PT Murini Sam Sam	PT Murini Sam Sam Mill	Murini Sam Sam	Riau	2015	Certified
10	PT Musi Banyuasin Indah	PT Musi Banyuasin Indah Mill	Sei Selabu, Sei Jarum, KUD Karya Gatra, KUD Karya Makmur Sriwijaya, KUD Panca Karya Jaya, KUD Sumber Makmur, KUD Tri Tunggal Karya	South Sumatra	2020	To be certified
11	PT Sinarsiak Dianpermai	PT Sinarsiak Dianpermai Mill	Sinarsiak DianPermai	Riau	2020	Pre assessment audit
12	Agrindo Indah Persada 2	Agrindo Indah Persada 2 Mill		Jambi	2023	Sudah menjalani NPP audit di tahun 2010
13	KUD Dastra II (Plasma binaan AMP)	PT AMP Plantation Mill		West Sumatera	2019	To be certified
14	KUD Dastra I (Plasma binaan PMJ)	PT AMP Plantation Mill		West Sumatera	2019	To be certified
15	KUD Sasak, KUD Kapar, Mutiara Bosa Sikilang, Permata Sawit Maligi (Plasma binaan PHP)	PT Gersindo Minang Plantation Mill		West Sumatera	2019	To be certified

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16	PHP (blok 22)	PT Gersindo Minang Plantation Mill		West Sumatera	2020	To be certified
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### Time Bound Plan for Wilmar International Limited (Africa)

No.	Company	Estate	Mill	Location	Certification year	Status
1	Benso Oil Palm Plantation (BOPP)	BOPP Adum Bansa Estate and associated Scheme Smallholders	BOPP Mill 1	Western Region, Ghana	2014	Certified
2	Biase Plantations Limited	Calaro Estate	Under Construction	Cross River State, Nigeria	2020	to be certified (mill construction in progress)
3	Biase Plantations Limited	Calaro Extension Estate	None planned	Cross River State, Nigeria	2022	to be certified (NPP completed recently in 2016. Land preparation no starting)
4	Biase Plantations Limited	Ibiae Estate	Construction not started	Cross River State, Nigeria	2020	to be certified (NPP completed. Mill construction yet to start)
5	Eyop Industries	Ibad Estate	Construction not started	Cross River State, Nigeria	2021	to be certified (mill construction yet to start), pending clarification for NPP assessment
6	Eyop Industries	Kwa Falls	None planned	Cross River State, Nigeria	2020	to be certified (replanting of existing plantations in progress)
7	Eyop Industries	Oban	None planned	Cross River State, Nigeria	2021	to be certified (NPP not started), Pending clearance from government for NPP assessment