



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

File Ref. : ES10170013

RSPQ PUBLIC SUMMARY

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

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
SOU 5 - Seri Intan	Seri Intan POM	3°58'9.22"N	100°59'8.01"E	Kilang Kelapa Sawit Seri Intan, Bt.5 Jin. Maharsja Lela, 38009 Teluk Intan, Perak
	Seri Intan Estate (Main Div.)	3°58'13.34"N	100°58'48.51"E	Seri Intan Estate, 38009 Teluk Intan, Perak
	Sabrang Estate	3°58'35.70"N	100°58'26.02"E	Sabrang Estate 38009, Teluk Intan, Perak.
	Sungai Wangi Estate	4°14'33.2"N	100°42'50.6"E	Ladang Sungai Wangi, 32000 Sitiawan, Perak
	Sogomana Estate	4°4'N	100°7'E	Ladang Sogomana, 32500, Changkat Kruing, Perak

MAP : See Attachment 1

AUDIT DATE : 3 - 6 January 2017

DURATION : 12 auditor days

TYPE OF AUDIT :

Annual Surveillance Audit No. 1

Recertification Audit

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

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

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

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Name : MOHD RAZMAN SALIM

Signature :

Date : 18 MAY 2017

Acknowledgement by Client's Representative

Name : SIME DARBY PLANTATION SDN. BHD.
COMPANY NO. 647766-V
SERI INTAN ESTATE

Signature :

Date : (ANIN BIN SUWARDI)
GENERAL MANAGER
30/5/2017

RSPO PUBLIC SUMMARY

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date	:	19-22 January 2016	No. of auditor days	: 12
Audit team	:	Khairul Najwan Ahmad Jahari, Jagathesan S., Zulkarnain Abdullah & Selvasingam T.Kandiah		
No. of major NCR	:	1	Indicator: 6.3.1	Closing date : 14/3/2016
No. of minor NCR	:	3	Indicator : 4.2.3, 6.2.3, 6.5.4	
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	:	Sabrang Estate and Sogomana Estate.		

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

RSPO PUBLIC SUMMARY

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

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

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

RSPO PUBLIC SUMMARY

SUMMARY OF INFORMATION

TYPE OF AUDIT	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Dec 2015 – Nov 2016	Jan – Dec 2017			
Certified Area (Ha)	10,185.57	11,244.64			
Production Area(Ha)	8,075.21	8,307.07			
HCV Area (Ha)	37.05	37.05			
Certified FFB Processed (MT)	203,571.32	209,794.50			
Production of Certified CPO (MT)	43,272.58	36,511.71			
Production of Certified PK (MT)	11,226.94	9,230.96			
REMARKS	NA	Refer to 3.1 – Justification for the additional of planted and certified area in Seri Intan CU.			

Table of contents	Page
1.0 AUDIT PROCESS	6
1.1 Certification body	6
1.2 Qualification of audit team	6
1.3 Audit methodology	6
1.4 Stakeholder Consultation	6
1.5 Audit plan	6
1.6 Date of next audit	6
2.0 SCOPE OF CERTIFICATION AUDIT	7
2.1 Description of the certification unit	7
2.2 Description of the Supply Base (including planting profile)	7
2.3 Organization Information / Contact Person(s)	8
3.0 AUDIT FINDINGS	9
3.1 Changes to certified products in accordance to the production of the previous year	9
3.2 Time bound plans including changes and reasons for the changes see below	9
3.3. Overall comment in terms of acceptance or non-acceptance on the changes in the time-bound plan (including details of non-adherence or the conditions justifying a time-bound plan have changed)	9
3.4 All associated smallholders (including scheme smallholders) where their fruit supply is included , by the mill, are audited within 3 years from when their fruit was first included in the mill certification.	9
3.5 Any new acquisition which has replaced primary forests or HCV areas	9
3.6 Other changes (e.g. organizational structure, new contact person, addresses, etc.)	9
3.7 Status of previous non-conformities * (refer to Attachment 6)	10
3.8 Complaint received from stakeholder (if any)	10
4.0 DETAILS OF NON-CONFORMITY REPORT	10
4.1 For P&C (Details checklist refer to Attachment 3)	10
4.2 For SC (Details checklist refer to Attachment 5)	10
5.0 AUDIT CONCLUSION	10
6.0 RECOMMENDATION	11
List of Attachment	
Attachment 1 : Map of SOU 5 – Seri Intan CU	12
Attachment 2 : RSPO Surveillance Audit Plan	13
Attachment 3 : RSPO P&C Audit Checklist And Findings	19
Attachment 4 : Details of Non-conformities and Corrective Actions Taken	46
Attachment 5 : RSPO Supply Chain at the palm oil mill – Identity Preserved Model – Module D	48
Attachment 6 : Status of Non-conformities Previously Identified	51
Attachment 7 : Time Bound Plan	53

RSPO PUBLIC SUMMARY

1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Razman Salim	Audit team leader / Workers & community issues, HCV, and related legal	<ul style="list-style-type: none"> • Possessed B.SC.Forestry (Hons) from University Putra Malaysia with more than 6 years of working experience in the Forest Management, HCVF and ecology
Mohd Zulfakar Kamaruzaman	Auditor / Environmental and OHS	<ul style="list-style-type: none"> • Holds a B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation. He has been trained as a RSPO Lead Auditor
Rozaimie Ab Rahman	Auditor / GAP & OHS	<ul style="list-style-type: none"> • Holds a B.Sc. of Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation.

1.3 Audit methodology

The audit covered the Seri Intan palm oil mill, Sungai Wangi Estate and Sogomana Estate. . The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The audit included an on-site audit to the estates, mill, linesites, amenities and facilities to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

There were no comments received from stakeholders prior to this annual surveillance audit.

1.5 Audit plan : Refer to Attachment 2

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

RSPO PUBLIC SUMMARY

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Seri Intan Certification Unit (Seri Intan CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn. Bhd. (SDPSB). The SOU is also known as SOU 5.

The Seri Intan CU comprises of the Seri Intan Palm Oil Mill (Seri Intan POM) and four supply base i.e. Sabrang Estate, Sungai Wangi Estate, Seri Intan Estate and Sogomana Estate which are all owned by SDPSB. The Seri Intan POM had a mill capacity of 60 mt/hr.

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

The FFB is sourced from company owned estates that are certified - Sabrang Estate, Sungai Wangi Estate, Seri Intan Estate and Sogomana Estate. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

**Table 1: Actual FFB production by the supply base for the last reporting period
(January 2016 to December 2016)**

Estates	FFB Production	
	Tonnes	Percentage (%)
Seri Intan Estate	50,523.110	33.95
Sungai Wangi Estate	32,075.260	21.56
Sogomana Estate	32,988.760	22.17
Sabrang Estate	18,200.440	12.23
Other Estate (from other SD SOU: crop diversion)*	15,010.840	10.09
Total	148,798.410	100

*Seri Intan POM has received certified FFB from other certified Sime Darby's estate which are:

- Sungei Samak Estate (Cert No.: RSPO 590802 – BSI. Expired: 04 October 2021)
- Cluny Estate (Cert No.: RSPO 0016 – SIRIM. Expired: 02 March 2021)
- Bikam Estate (Cert No.: RSPO 0016 – SIRIM. Expired: 02 March 2021)

Table 2: Projected FFB production by supply base for the next reporting period (January 2017 to December 2017)

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Seri Intan Estate	77,918.970	37
Sungai Wangi Estate	56,669.540	27
Sogomana Estate	41,122.990	20
Sabrang Estate	34,083.000	16
Total	209,794.500	100

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(January 2016 to December 2016)**

	Total (MT)
FFB Received	148,798.410
FFB Processed	148,798.410
Certified FFB	133,787.570
Non Certified FFB	0
Other Estate (from other SD SOU: crop diversion)*	15,010.840
CPO Production	32,346.538
PK Production	8,039.538
CPO delivered as Identity Preserved	2,693.28
CPO delivered as Mass Balance	21,996.910
CPO delivered as non-RSPO certified	7,566.970
PK delivered as Identity Preserved	571.990
PK delivered as Mass Balance	6,317.970

RSPO PUBLIC SUMMARY

PK delivered as non-RSPO certified	1,199.120
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*Seri Intan POM has received certified FFB from other certified Sime Darby's estate which are:

- Sungai Samak Estate (Cert No.: RSPO 590802 – BSI. Expired: 04 October 2021)
- Cluny Estate (Cert No.: RSPO 0016 – SIRIM. Expired: 02 March 2021)
- Bikam Estate (Cert No.: RSPO 0016 – SIRIM. Expired: 02 March 2021)

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (January 2017 to December 2017)

	Total (MT)
FFB Received	209,794.500
FFB Processed	209,794.500
CPO Production	45,639.640
PK Production	11,538.700
CPO delivered as Identity Preserved	36,511.712
CPO delivered as non-RSPO certified	9,127.928
PK delivered as Identity Preserved	9,230.960
PK delivered as non-RSPO certified	2,307.740

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Seri Intan Estate	2,500.45	2,960.40
Sungai Wangi Estate	1,801.69	2,224.04
Sogomana Estate	2,101.29	2,215.98
Sabrang Estate	3,703.74	3,844.22
Total	10,107.17	11,244.64

Table 6 Planting profile for Seri Intan CU

<u>Estate</u>	<u>Year of establishment</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Seri Intan Estate	1946	2227.37	273.08	2500.45	89.08	10.92
Sungai Wangi Estate	1906	1616.78	184.91	1801.69	89.74	10.26
Sogomana Estate	1976	1620.96	480.33	2101.29	77.14	22.86
Sabrang Estate	1946	2841.96	861.78	3703.74	76.73	23.27
Total		8307.07	1800.1	10107.17	82.19	17.81

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	: Mr Balachandrun Madhavan
Position	: General Manager, Perak South Zone
Address	: Perak South Zone Office, c/o Ladang Sungai Wangi, 32000 Sitiawan, Perak Darul Ridzuan
Phone no.	: +605-6221477
Fax no.	: +605- 6222434
Email	: balachandrun@simedarby.com

3.0 AUDIT FINDINGS

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

During this audit, there was a changes for planted area in Sg. Wangi Estate with additional of 79.74 ha due to replanting programme at Bilham Division in 2014. This immature field was not updated in the planted area figure during the audit in 2015.

At Sogomana Estate, management has decided to add Cashwood Division and Sg. Bruas Division into Sogomana Estate. Therefore, planted area and certified area for Sogomana Estate had increased. Thus, the latest total planted area for Sogomana Estate is 2,101.29 ha [Cashwood Division (767.69 ha) and Sg. Bruas Division (267.94 ha)]. While the total certified area is 2,215.98 ha - Cashwood (802.87 ha) and Sg. Bruas (291.15 ha).

3.2 Time bound plans including changes and reasons for the changes see below

	Yes	No	<u>If yes, state reasons/justifications</u>
- acquisitions/disposals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- emergence/re-emergence of land disputes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- labour conflicts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

3.3 Overall comment in terms of acceptance or non-acceptance on the changes in the time-bound plan (including details of non-adherence or the conditions justifying a time-bound plan have changed)

Sime Darby Plantation Sdn Bhd (SDPSB) had established a time bound plan to certify all of its SOUs to be certified for the RSPO. To date 59 SOUs (in Malaysia and Indonesia) had been certified. Refer to Attachment 7 of this report.

3.4 All associated smallholders (including scheme smallholders) where their fruit supply is included , by the mill, are audited within 3 years from when their fruit was first included in the mill certification. Yes No

If no, please state reasons No associated smallholders

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

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

There were no significant changes observed during the audit except for the rotation of few key personnel among the operating unit.

RSPO PUBLIC SUMMARY

3.7 Status of previous non-conformities *

Closed

Not closed

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

3.8. Complaint received from stakeholder (if any)

No complaint received from stakeholder as verified during interview with local village head from Kg. 40 Rantai and Kg. Batak Rabbit, contractors, suppliers, local and foreign workers.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

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

List : 4 Minor NCR = 2.1.3, 4.1.2, 4.5.2 & 4.8.2

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

List : NA

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

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

List : NA

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

List : NA

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has / ~~has not~~* 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.

RSPO PUBLIC SUMMARY

6.0 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

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

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

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

Recommended to continue certification.

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

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

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

Audit Team Leader : MOHD RAZMAN SALIM



27/2/2017

(Name)

(Signature)

(Date)

Map of SOU 5 – Seri Intan CU



RSPO SURVEILLANCE 1 AUDIT PLAN

1. Objectives

The objectives of the assessment are as follows:

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

2. **Date of assessment** : 3 - 6 January 2017

3. **Site of assessment** : SOU 5 - Seri Intan

- Seri Intan Palm Oil Mill
- Sungai Wangi Estate
- Sogomana Estate

4. **Scope of Certification** : Production of crude palm oil and palm kernel using identity preserved (IP) model

5. Reference Standard :

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

6. Assessment Team

Assessor: Mohd Razman Salim
 Mohd Zulfakar Kamaruzaman
 Rozaimée Ab Rahman
 Aminah Ang (Trainee Auditor)

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 60 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 60 days, the certificate shall be terminated. Recurrence of major non-conformities on the same issues shall be recommended for immediate suspension. Minor non-conformities shall be upgraded to major non-conformities if the corrective actions taken are not satisfactorily and effective.

For minor non conformities raised in the surveillance audit, corrective action plans shall be submitted within 60 days. Verification of implementation of corrective actions will be carried out during the next audit. If corrective action plans to address the minor non-conformity(ies) are not submitted within 60 days, the RSPO.

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.

RSPO PUBLIC SUMMARY

- 10. Conflict of interest**
Auditors have not been employed by the organization concerned nor provided consultancy services relating to the development of its system in the past five years and next five years.
- 11. Working Language** : English and Bahasa Malaysia
- 12. Reporting**
- a) Language : English
 - b) Format : Verbal and written
 - c) Expected date of issue : 30 days after the date of assessment
 - d) Distribution list : Client file
- 13. 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
- 14. Assessment Programme Details** : As shown below

RSPO PUBLIC SUMMARY

Day 1: 3 January 2017 (Tuesday)				
Time	Activities / areas to be visited			
9.00 – 9.30 am	<p><u>Opening meeting at Sungai Wangi Estate</u> Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes</p> <p>Organization Representative to brief on the following :</p> <ol style="list-style-type: none"> 1) RSPO implementation at Seri Intan SOU (i.e. mill & supply base) including changes 2) Time bound plan for Sime Darby 3) Significant changes on organization activities, machinery, supply bases capacity etc. 			Top mgmt & Committee Member
	Razman	Zulfakar	Rozaimée	
9:30 – 1:00 pm	<u>Sungai Wangi Estate</u>	<u>Sogomana Estate</u>	<u>Sogomana Estate</u>	Guide(s) for each assessor
	Coverage of assessment: P1, P2, P5, P6, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Land titles user rights • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use • Riparian zone • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Interview workers, GPW, local communities and stakeholders • Training and skill development programmes • Continuous improvement 	Coverage of assessment: P1, P2, P4, P5, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Occupational safety & health practice – witness activities at site • Environmental management – witness activities at site • Waste & chemical management • Interview with workers, safety committee and contractors • Facilities at workplace • Training and skill development programmes • Continuous improvement 	Coverage of assessment: P1, P2, P3, P4, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Commitment to long-term economic and financial viability • Interview with workers and contractors • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Chemical store/fertilizer • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement 	
1.00 – 2.00 pm	Break			
2.00 – 5.00 pm	Continue assessment			Guide(s) for each assessor
Day 2: 4 January 2017 (Wednesday)				
Activities /areas to be visited	Razman	Zulfakar	Rozaimée	
8.30 – 1.00 pm	<u>Sogomana Estate</u>	<u>Sungai Wangi Estate</u>	<u>Sogomana Estate</u>	Guide(s) for each assessor
	Coverage of assessment: P1, P2, P5, P6, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Land titles user rights • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use 	Coverage of assessment: P1, P2, P4, P5, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Occupational safety & health practice – witness activities at site • Environmental management – witness activities at site • Waste & chemical management 	Coverage of assessment: P1, P2, P3, P4, P7, P8 <ul style="list-style-type: none"> • Laws and regulations • Commitment to long-term economic and financial viability • Interview with workers and contractors • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) 	

RSPO PUBLIC SUMMARY

	<ul style="list-style-type: none"> • Riparian zone • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Interview workers, GPW, local communities and stakeholders • Training and skill development programmes • Continuous improvement 	<ul style="list-style-type: none"> • Interview with workers, safety committee and contractors • Facilities at workplace • Training and skill development programmes • Continuous improvement 	<ul style="list-style-type: none"> • EFB mulching, POME application • Chemical store/fertilizer • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement 	
1.00 – 2.00 pm	Break			
2.00 – 5.00 pm	Continue assessment		<p style="text-align: center;"><u>Sungai Wangi Estate</u></p> <p>Coverage of assessment: P1, P2, P3, P4, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Commitment to long-term economic and financial viability • Interview with workers and contractors • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Chemical store/fertilizer • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement 	Guide(s) for each assessor

RSPO PUBLIC SUMMARY

Day 3: 5 January 2017 (Thursday)				
Activities /areas to be visited	Razman	Zulfakar	Rozaimée	
8.30 – 1.00 pm	<p align="center"><u>Seri Intan POM</u></p> <p>Coverage of assessment: P1, P2, P6, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Land titles user rights • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Interview workers, GPW, local communities and stakeholders • Training and skill development programmes • Continuous improvement 	<p align="center"><u>Seri Intan POM</u></p> <p>Coverage of assessment: P1, P2, P4, P5, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Occupational safety & health practice – witness activities at site • Environmental management – witness activities at site • Waste & chemical management • Interview with workers, safety committee and contractors • Facilities at workplace • Training and skill development programmes • Continuous improvement 	<p align="center"><u>Sungai Wangi Estate</u></p> <p>Coverage of assessment: P1, P2, P3, P4, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Commitment to long-term economic and financial viability • Interview with workers and contractors • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Chemical store/fertilizer • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement 	Guide(s) for each assessor
1.00–2.00 pm	Break			
2.00 – 5.00 pm	Continue assessment			Top management & Committee member

Day 4: 6 January 2017 (Friday)				
Activities /areas to be visited	Razman	Zulfakar	Rozaimée	
8.30 – 12.00 pm	<p align="center"><u>Seri Intan POM</u></p> <p>Coverage of assessment: P1, P2, P6, P7, P8</p> <ul style="list-style-type: none"> • Laws and regulations • Land titles user rights • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, GPW, local communities and stakeholders • Training and skill development 	<p align="center"><u>Seri Intan POM</u></p> <p>RSPO Supply Chain implementation including the model used</p> <ul style="list-style-type: none"> • General Chain of Custody System Requirements for the supply chain • Documented procedures • Purchasing and goods in • Outsourcing activity • Sales and goods out • Processing • Records keeping • Registration • Training 	<p align="center"><u>Seri Intan POM</u></p> <ul style="list-style-type: none"> • Continue assessment on unfinished area • Verification on outstanding issues 	Guide(s) for each assessor

RSPO PUBLIC SUMMARY

	programmes • Continuous improvement	• Claims			
12.00–3.00 pm	Break & Friday Prayer				
3.00 – 4.00 pm	<ul style="list-style-type: none"> • Continue assessment on unfinished area • Verification on outstanding issues • Audit Team discussion, preparation on audit findings and issuance of NCR (if any) 			Guide(s) for each assessor	
4.00 – 5.00 pm	Closing meeting			Top management & Committee member	

RSPO PUBLIC SUMMARY

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	Seri Intan CU continued to implement the procedure for responding to any communication as outlined in their Estate / Mill Quality Management System documents. The flow chart of the procedure was made available on notice boards in the Estate office and Muster Grounds. The records of communication were identified and maintained. Among the records sighted were correspondences with the authorities, local communities and employees. At Sungai Wangi Estate and Sogomana Estate, management documents related to environment, social and legal issues, were made available to the public except for those prevented by commercial confidentiality or where disclosure of such information would result in negative environmental or social outcomes. Both Estates continued to maintain stakeholders list for contractors, vendors/suppliers, government agencies, schools, local communities, etc. In addition to the above, SDPSB continued to use internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances were readily made available through SDPSB website at http://plantation.simedarby.com
	1.1.2 Records of requests for info and responses shall be maintained. Major Compliance	Yes	Among the records inspected were correspondences with the authorities, local communities and employees. The latest communications sighted in the Buku Aduan.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1 Land titles/user rights (Criterion 2.2);	Yes	Information relating to land titles are available at the SDPSB website at http://plantation.simedarby.com .
	Occupational health and safety plans (Criterion 4.7);	Yes	Both estates and the mill have established the Safety and Health plan. The SDPSB OHS Policy (in both Bahasa and English) is available at all the operating units. The policy has been communicated to all level of employees through briefings and displayed at respective office's notice boards.
	Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	Yes	Social impact assessments and its relevant plans were made available at the visited site. Environmental Management Plan FY 2016 / 2017, Pollution Prevention Plan 2016 / 2017 and the Waste Management Action Plan 2016 / 2017 have been established by the estates. The implementation of the action plan was monitored accordingly.
	HCV documentation summary (Criteria 5.2 and 7.3);	Yes	HCV documentation summary is available in the 'HCV Re-Assessment for strategic operating unit (SOU) 5 Seri Intan/Selaba – Table 8 Summary of HCV tasks'.
	Pollution prevention and reduction plans (Criterion 5.6);	Yes	The Environmental Management Plan 2016 / 2017 has been established and was reviewed in June 2016. The plan includes elements of Pollution Prevention Plan. The status of the action taken were being monitored.
	Details of complaints and grievances (Criterion 6.3);	Yes	Details of grievances, complaints and actions taken to solve them were recorded in the Complaints Book

RSPO PUBLIC SUMMARY

		Negotiation procedures (Criterion 6.4);	Yes	Negotiation procedures such as 'Procedures for Handling Social Disputes' was made available at the office for stakeholders.
		Continual improvement plans (Criterion 8.1);	Yes	Sime Darby Plantation Sdn. Bhd. is committed to utilize the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated for continuous improvement in its key areas of operations on environmental, safety, health and welfare of the workers as well as social contribution to the community.
		Public summary of certification assessment report;	Yes	Public summary for RSPO certification assessment report can be assessed at the link below: http://www.sirim-gas.com.my/sirim/core-files/uploads/2017/02/13-Sime-Darby-Plantation-Sdn-Bhd-%E2%80%93-Seri-Intan-Palm-Oil-Mill-Recertification-2016.pdf
		Human Rights Policy (Criterion 6.13).	Yes	A Social Policy which included the need to respect human rights has been established by the CU. Through interview with workers, it was noted that the policy has been communicated to all levels of their employees.
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	A documented code of ethical conduct and integrity in all operations and transactions has been established as observed in a "Code of Business Conduct (COBC)" booklet, which available in the website: http://www.simedarby.com/about-us/governance/ and had been communicated to employees.

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. The last update was on July 2016. The following licenses and permits were verified: MPOB Licenses, Permit from the Ministry of Domestic Trade and Consumer Affairs for storage of diesel and Permits from DOSH. And the following legal requirements were sighted : <ul style="list-style-type: none"> • Factory and Machinery Act 1967 <ul style="list-style-type: none"> ○ <i>Person In Charge Regulation 1970</i> ○ <i>Steam Boiler and Unfired Pressure Vessel 1970</i> ○ <i>The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2)</i> ○ <i>Noise Exposure Regulations 1989</i> • Environmental Quality Act 1974 <ul style="list-style-type: none"> ○ Section 49A of the EQA 1974 amendment 2014. ○ EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 ○ EQ (Clean Air) Regulations 2014 - Air monitoring, Black smoke, Stack sampling ○ EQ (Scheduled Wastes) Regulations 2005 • OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to

RSPO PUBLIC SUMMARY

				<p>Health Regulations 2000</p> <ul style="list-style-type: none"> Electricity Supply Act 2015
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	Yes	Seri Intan CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operations. Each office of the mill and supply bases has its own Legal and Other Requirements Register were being evaluated annually for its compliance. The latest review was carried out by the Quality Management Officer in Nov 2016. The acts and its regulations were evaluated for compliance annually.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	No	<p>The mechanism to ensure compliance to legal and other requirement maintained implemented, as documented in the Estate / Mill Quality Management System under Standard Operation Manual. The documents were distributed to all operating units under Seri Intan CU. PSQM Department and the respective operating units are responsible for identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. The Legal and Other Requirements Register for Seri Intan CU was reviewed in Nov 2016. The register was prepared by the Quality Management Officer, checked by the Assistant Manager and approved by Manager of respective unit. However, sighted that mechanism for ensuring compliance was not effective at Seri Intan POM. Minor NCR MZK 01 2017 was raised for the following:</p> <ul style="list-style-type: none"> Flowrate of treated effluent discharge was monitored and submitted to DOE on monthly basis. However, occasionally the flowrate exceeded the design capacity of the plant but were no remarks were noted in the form. Noted that the results of the effluent quality were in-compliance with the regulatory limit. Water sampling at the monsoon drain pit was not carried out. Evidence of boiler ash flowing to the drain.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	Yes	The tracking for changes in the law was carried by PSQM Department, Group Compliance Office based at SDPB headquarters in Kuala Lumpur and disseminated to all CUs which then updates its legal register from time to time. The latest review and evaluation of their legal register was in Nov 2016 where the Minimum Wage Order 2016 was included.
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	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognized NCR land) and the actual legal use of the land shall be available. Major Compliance	Yes	Copy of legal ownership of the lands for the audited supply base was available. All original copies of ownership documents are kept at the Sime Darby Headquarters in Kuala Lumpur.

RSPO PUBLIC SUMMARY

or user rights	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	Yes	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to the surrounding villages. During site visit, it was found that markers are available and maintained. The markers have also been confirmed during the consultation with all the interviewed village heads.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	Yes	There is no dispute in Seri Intan CU. It was confirmed during interviewed with the village head of nearby villages. Auditor also has verified land title of the visited estates and mill which are officially owned by SPDSB.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	Yes	There is no land conflict sighted during the audit, as explained in indicator 2.2.3
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	Yes	There is no land conflict sighted during the audit, as explained in indicator 2.2.3
	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	Site visits to Seri Intan CU found no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.
C 2.3 Use of the land for oil palm does not diminish the legal,customary or user rights of other users	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance	Yes	There was no record of disputes since the last audit. It was confirmed during the consultation with the village heads of nearby villages.

RSPO PUBLIC SUMMARY

without their free, prior and informed consent.	2.3.2	<p>Copies of negotiated agreements detailing the process of free, prior and informed consent FPIC shall be available and shall include:</p> <p>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;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>Minor Compliance</p>	Yes	There was no record of disputes since the last audit, as explained in indicator 2.3.1
	2.3.3	<p>All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>Minor Compliance</p>	Yes	There was no record of disputes since the last audit, as explained in indicator 2.3.1

RSPO PUBLIC SUMMARY

	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, incl. legal counsel. Major Compliance	Yes	There was no record of disputes since the last audit, as explained in indicator 2.3.1
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Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Clause	Indicators		Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	A business or management plan (min. 3yrs) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	Yes	Both estates continued to make commitment to long-term economic and financial viability. The annual budgets for 2016/17 to 2019/2020 were sighted. The budget provided provisions of activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance, etc. The budget also included projections on yield/ha, and total cost of production per MT & per ha.
	3.1.2	An annual replanting programme projected for a min. of 5yrs, with yearly review, shall be available. Minor Compliance	Yes	The replanting programmes until 2020/21 were sighted for both estates. This programmes are reviewed once a year and had been incorporated into their annual financial budget.

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

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored	4.1.1	Standard Operating Procedures for estates and mills shall be documented. Major Compliance	Yes	Seri Intan CU continued to use the Plantations Quality Management System Manual, Standard Operating Manual and Procedures, Agriculture Reference Manual, “Guidelines On River Management” manual, Sustainable Plantation Management System Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, and Security Guidelines. It includes the operation activities in the estates from seedlings in nursery to planting of young palms, plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. On top of the PQMS, technical guidelines as listed in the Agricultural Reference Manual were also used. Contents of the Manual were disseminated to the workers through morning roll call and trainings. The Manual is also kept in the administration office where everyone can refer to. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural / Mill Practice and the care for their safety and health and the environment.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	No	As for all the other SDPSB estates, both estates had a list of SOPs in the EQMS and Agriculture Reference Manual. Both Estates monitored good agricultural practices as per SOPs by on-site visits, inspections and discussions with relevant personnel and by conducting assessments and audits such as Internal Audits, RSPO Audits and visits by

RSPO PUBLIC SUMMARY

				PAs and Agronomists. However, during the site visit at Sungai Wangi Estate several non-compliances were detected indicating that the mechanism established were not fully in-place. Therefore, a Minor NCR # RR 01 2017 was raised during the audit.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	Yes	Records of monitoring and actions taken by the estates were maintained. This ensured that the established procedures were consistently implemented. Records of monitoring and actions taken by both estates were maintained and kept for a min. of 12 months. Monthly Costing and Annual Reports on monitoring of all activities were available.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	Yes	It was confirmed that no third party FFB supplier sent to Seri Intan POM.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOP, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	Yes	Both estates practiced the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention and some EFB and compost application. Fertiliser application which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Agronomist from their internal research centre. The annual fertiliser recommendations are made based on annual foliar sampling and 5 yearly soil sampling. Fertiliser application program was monitored using records like program sheets.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	Yes	Fertiliser application program was monitored using records like program sheets, bin cards, field cost book, Summary Fertiliser Application & Sign Off forms, etc. Records of programs and applications of fertilisers were made available to auditors.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	Yes	From the Agronomist reports, it was established that both estates carried out periodic foliar sampling for the nutrients. The latest foliar sampling in Sogomana & Sungai Wangi Estate were carried out in Mar 2016 which formed the basis recommendation for 2017. At the same time, the soil maps were also made available to the auditors for review.
	4.2.4	A nutrient recycling strategy shall be in place, and may incl. use of EFB, POME, and palm residues. Minor Compliance	Yes	Both estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB application. EFB application was carried in the Immature areas. There was no POME land application in both estates.
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	Based on the soil maps provided, it was confirmed that there was no fragile/marginal soils in both estates visited.
	4.3.2	A management strategy shall be in place for plantings on slopes bet. 9' & 25' unless specified otherwise. Minor Compliance	Yes	The strategy in place for plantings on slopes between 9 and 25 degrees was in the Slope & River Protection Policy – Buffer Zone & 25-degree slope and the Land Preparation for Terracing in ARM Manual.
	4.3.3	A road maintenance prog. shall be in place. Minor Compliance	Yes	During the field visit, it was noted road conditions was well maintained in both estates. Accessibility was made possible by regular maintenance, guided by its road maintenance programmes. The program had been supported by adequate provisions in the budgets. For road maintenance both estates had used motor graders and tractor drawn rollers, back hoes, tractors with back buckets and excavators. For resurfacing crusher run was purchased.
	4.3.4	Subsidence of peat soils shall be min. and monitored. A documented water and ground	Yes	There were no peat soils in both estates visited.

RSPO PUBLIC SUMMARY

		cover management prog. shall be in place. Major Compliance		
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	Yes	Not applicable as there were no peat soils in both estates visited.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	Yes	Not applicable as there were no peat soils in both estates visited. There are no fragile soils in both estates.
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	An implemented water management plan shall be in place. Minor Compliance	Yes	Both estates had implemented their water management plans. Plans for 2016/2017 were sighted. The water management plans were more towards pollution prevention and domestic use. The management plan covered dry spell/shortage and in case of water pollution. Water management for replanting area was used water conservation pit technique for purposed to trap water from rain.
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring app. riparian and other buffer zones shall be demonstrated. Major Compliance	Yes	There are no water ways or rivers passing through the Sungai Wangi Estate and Sogomana Estate.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality in compliance with nat. regulations. Minor Compliance	Yes	Site visit to the effluent treatment plant and interview with operator in-charge revealed that the operation was in accordance with the standard operation procedure and legal requirements. No effluent over flow was sighted and flow meter reading was recorded on daily basis. Mill records of water monitoring for DOE submission provided. Noted that the BOD results was below than the stipulated limit.
	4.4.4	Mill water use/MT of FFB shall be monitored. Minor Compliance	Yes	Mill water usage per tonne of FFB continued to be monitored on monthly basis. A slight increase in trend was noted. This was due to cleaning process in the mill.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed thru IPM	4.5.1	Implementation of IPM shall be monitored. Major Compliance	Yes	Not applicable as there were no peat soils in both estates visited. There are also no fragile soils in both estates.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	No	Training of those involved in IPM implementation was not demonstrated. There was no evidence to show that training of employees involved in IPM conducted at Sungai Wangi Estate. Thus, a Minor NCR RR 02 2017 was raised.
C 4.6 Pesticides are used in ways that do not endanger health or the environment	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have min. effect on non-target species shall be used where available. Major Compliance	Yes	Not applicable as there were no peat soils in both estates visited. There are no fragile soils in both estates. Sungai Wangi Estate had well managed soil water levels by having well established systems of drains.
	4.6.2	Records of pesticides use (incl. active ingredients used and their	Yes	Both estates had documented programs for spraying pesticides and for rat baiting. Both units visited had records to show the types of pesticides used with active ingredients and

RSPO PUBLIC SUMMARY

	LD50, area treated, amount of active ingredients applied per ha and number of app.) shall be provided. Major Compliance		their LD50 and where these pesticides had been used, the total quantity, number of applications and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in-progress reports.
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	Yes	As part of the IPM plans, management of both estates had established nectariferous beneficial plants nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. As mentioned in 4.5.1, during the visit it was observed a number of beneficial plants had been planted. Nurseries at both estates had plants ready for planting. In both estates, as per the SOP, prophylactic spraying using diluted cypermethrin for immature palms in zero burning of oil palm to oil palm replanting was carried out against rhinoceros' beetles. In some replants, pheromone traps were used and cypermethrin is sprayed only when the beetle numbers trapped were high.
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 Reg. (2000). Minor Compliance	Yes	Both estates only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all SDPSB estates. There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used.
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. App. safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance	Yes	Records showed that pesticides were handled, used and applied by trained persons and as per the CSDS of the pesticide. As mentioned under Indicator 4.6.1, Standard Operating Procedures for safe-handling of pesticides was in place. Storekeepers, sprayers, fertilizer and rat bait workers were trained and they understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the CSDS training. It was also noted that CSDS are available at point of use i.e. chemical stores. Training on pesticide handling was conducted at Sogomana Estate in Feb 2016 by the respective Managers and Sustainability Officer. Training on spraying which included the safety aspects and usage of PPE when handling with pesticides was carried out in June 2016 at Sungai Wangi Estate. Records of training were available for verification.

RSPO PUBLIC SUMMARY

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 Reg. Major Compliance	Yes	The chemical stores in Sogomana Estate and Sungai Wangi estate were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. Record of purchase, storage and use had been properly maintained. All stores were well ventilated. Exhaust fans were available and the doors were lock for security purpose. Only authorized personnel were allowed to handle the chemicals. All chemicals were stored and segregated accordingly. Empty pesticides containers had been triple rinsed, holes punched in them and stored separately in the schedule waste store.
4.6.7	Application of pesticides shall be by proven methods that min. risk and impacts. Minor Compliance	Yes	Pesticide applications were guided by SDPSB's ARM, Pictorial Guide, CHRA and by CSDS supplied by the manufacturer. It was observed the procedures were implemented accordingly.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Comm. shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	Yes	Aerial spraying was not practiced by both Sungai Wangi Estate and Sogomana Estate and there was no evidence to show that any had been carried out.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated s/holders on pesticide handling shall be demonstrated/ made available. Minor Compliance	Yes	The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. Verification of attendant list showed that training had been carried out related to spraying and tractor driver, safety briefing for manure, sprayer training, safety briefing (rat baiting), PPE briefing, manuring application & safety training, safety town hall.
4.6.10	Proper disposal of waste material, acc. to procedures that are fully understood by workers demonstrated. Minor Compliance	Yes	It has been verified that the disposal of waste materials related to pesticide containers are being carried out as per established procedures. Wastes inventory was evident. Noted that disposal of scheduled wastes was through licensed contractors.
4.6.11	Specific annual medical for pesticide operators, and documented action to treat related health conditions, demonstrated. Major Compliance	Yes	All sprayers, store keepers and workers handing pesticides in both estates were sent for annual medical surveillance and the records were reviewed by the audit team.
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women	Yes	In Sogomana Estate identification of pregnancy was done by the MAs and HAs based on interview with women on the last periods dates. This interview is done during the monthly medical check-up. Doubtful cases were sent to the VMO for pregnancy test.

RSPO PUBLIC SUMMARY

		Major Compliance		There was no evidence that work with pesticides was undertaken by pregnant or breastfeeding women. Medical Assistants and workers confirmed this during interviews.
<p>C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:</p>	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	Yes	Both estates continued to implement the SDPSB Occupational Safety and Health Policy. The policy had been communicated to all employees through briefings and being displayed on the estates notice boards. It was also communicated to all workers by the workers' representative in OSH committee. A safety and health plan for Seri Intan POM was evident through the Environment, Safety & Health Program dated in July 2016. The OHS management plan addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE & OSH Committee meetings. Generally, the ESH program noted to be satisfactory.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	Yes	HIRARC had been carried out covering activities in the estates and mill. Updated HIRARC register were presented to the audit team during the audit. At Seri Intan POM, the HIRARC was updated in Aug 2016. He HIRARC has been reviewed based on accident occurred, such as slippery ladder, repairing streetlight, Maintenance at Press, and Mixing lab control where existing control has been revised. At Sungai Wangi and Sogomana Estate, HIRARC was reviewed in Aug 2016. This review was done after the accident to a harvester in July 2016. Relevant reports were submitted to DOSH. Refresher training was conducted to all harvester on the safe operating procedure.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appr. protective equipment shall be available to all workers at the place of work to cover all potentially haz. op., such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	Yes	Training and briefing on the operations were provided to the workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. All workers were provided with appropriate PPE and replaced when damaged. PPE issuance and replacement records were verified by the audit team. It was observed that PPE was used by workers working in the fields.
	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	<u>Seri Intan POM</u> - Safety & Health Committee has been established through the ESH committee. ESH safety committee organization chart for 2016 was reviewed. The committee is chaired by the Mill Manager and the secretary is the QA. Periodic meetings were carried out accordingly and the minutes of the meeting was maintained. <u>Sg. Wangi & Sogomana Estates</u> - The OSH Committee organizational chart for 2016/2017 at Sogomana estate and Sungai Wangi estate mill were presented to the auditor. The established committee comprised of the Chairman (Senior Manager), Secretary (Hospital Assistant) and management and worker's representatives. Quarterly meeting was held and records of meeting held were verified.

RSPO PUBLIC SUMMARY

	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	The CU adhered to the SDPSB policy on 'Crisis Management & Emergency Response' plan of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure" of the same manual. Each estates and mill had procedures for Fire, Flood, Chemical spillage, Strikes and Emergency and Accident Response in both English and Bahasa. The procedures were displayed in office, Muster Ground, Workshop and Dispensary. Telephone numbers and names of the members of the Emergency Response Team were communicated to all employees and displayed at notice boards. Telephone numbers of the Police Station, Fire Brigade, Immigration Department and Hospital were also included. The ERT consisting of trained First Aiders, mill/field staffs, mandores, Admin clerk, workshop operator and Security personnel. Interviews with mill/estate staffs and mandores revealed they had understood and were aware of the emergency procedures requirements. It was observed on site that all operating units had been provided with first aid boxes which were checked on a monthly basis by the Medical Assistants. Records of replenishment were verified by the auditor.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	Yes	Sungai Wangi Estate provides Medical care to Estate workers with clinics established within the premises and more serious cases are referred to Hospital Seri Manjung which is about 10 Km from estate. For Mill workers, they are clinics in the Seri Intan Estate for minor injury and for Major Injury will be send to Hospital Teluk Intan which is 15 km from the mill. The CU had continued to provide group insurance for all foreign workers as required under the Workmen Compensation Act 1992. Sighting of records and cross check with workers showed that they were covered with valid insurance policy. Local workers are covered by SOCSO.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	Yes	Seri Intan POM had monitored the occupational injuries using Lost Time Accident metrics. Records associated with JKPP 8 were available for all sites audited and were verified by the auditor. At Sogomana Estate, 2 cases of accident recorded with 28 days of LTA occurred. The estate has reported all the accidents to DOSH by submitting JKPP 6 in Feb & Aug 2016. HIRARC had been reviewed taking into accounts accidents issues. Summary of JKPP 8 has been submitted to DOSH in Jan 2017. At Sungai Wangi Estate, 1 case of accident recorded with 22 days of LTA. The estate has reported the accident to DOSH by submitting JKPP 6 in Jan 2016. HIRARC reviewed and JKPP 8 submitted to DOSH in the same month.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	Yes	Formal training programmes for 2016/2017 covering all aspects of the RSPO Principles and Criteria was established. Regular assessments of training needs were presented to auditors by the Seri Intan POM and both estates. Year 2016/2017 Training Plan was established in July 2016. A training needs identification matrix has been established with target dates for the training to be conducted.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	No	The Seri Intan CU had trained their staffs and workers, and records of training were kept in the RSPO training file. Attendance sheets were available which included the name and signature of the attendees, name of the trainer, time and venue. Records of training on social, child protection and HCV for financial year 2015/2016 has been made

RSPO PUBLIC SUMMARY

				available at the visited site. However for financial year 2016/2017, the same training will be conducted in April 2017. During the audit, the auditor found that not all training records were effectively maintained. At Seri Intan POM, Sungai Wangi Estate and Sogomana Estate some of the records of the training were not available. Therefore, Minor NCR MZK 02 2016 was issued.
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Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Clause	Indicators		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	Yes	The CU has established its environmental aspects/impacts register associated with their activities. Environmental aspect and impact covers all upstream activities such as FFB reception until downstream processes. The identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the boiler stack emission, palm oil mill effluent discharge and land contamination from the managing of the scheduled wastes and also general wastes. For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons. Minor Compliance	Yes	<u>Seri Intan – POM</u> - The identification of the Environmental Aspect and Impact, the Environmental Management Plan FY 2016 / 2017 comprising of Pollution Prevention Plan and Identification, Disposal and Reduction Effort of Wastes FY 16/17 were reviewed updated in July 2016 by QA and approved by the Mill Manager. No significant changes to the impact evaluation was noted. <u>Sogomana Estate</u> - Environmental Management Plan for FY 2016 / 2017 has been established in July 2016 and the status of the actions taken were monitored and recorded and the Environmental Aspect and Impact Identification Form was reviewed in Sept 2016. New environmental aspects associated with the re-planting activities were identified. <u>Sungai Wangi Estate</u> - Environmental Management Plan for FY 2016 / 2017 has been reviewed in Nov 2016 and the Environmental Aspect and Impact Identification was reviewed in Dec 2016.
	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 min. every 2yrs to reflect the results of monitoring and where there are operational changes that may have pos. and neg. env. impacts. Minor Compliance	Yes	<u>SOU Seri Intan</u> Pollution Identification Environmental Improvement action plan to monitor the effectiveness of the mitigation measures taken were in place. Y2016 Performance verified, noted to be satisfactory.

RSPO PUBLIC SUMMARY

<p>C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	Yes	Information was gathered in a HCV Assessment dated December 2015, which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there is a water catchment areas at Sogomana, Seri Intan Estate and Sg. Bidor. At Sabrang Estate, there is Sg, Perak. There is no HCV area at Sungai Wangi Estate.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	Yes	The HCV Assessment report indicated that there is no threatened or endangered species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan dated December 2016, and made available in Sungai Wangi Estate and Sogomana Estate.
	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	Yes	There is no RTE identified at the Sungai Wangi Estate. Sime Darby has established disciplinary measure in accordance with national law.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	Yes	An action plan for FY2016/2017 was made available at the Sogomana Estate. The outcomes of monitoring was included in the HCV report. Sogomana Estate has conducted daily monitoring on HCV areas for water catchment and border estate area with the forest reserve. The monitoring information was recorded in the logbook, monitored by Auxillary Police at Sogomana Estate. The monitoring did not found any significant finding such as illegal hunting or encroachment and the HCV action plan FY2016/2017 has been maintained.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, evidence of a negotiated agreement that optimally safeguards HCVs and these rights. Minor Compliance	Yes	There is no HCV set-asides with existing right of local communities in Seri Intan CU

RSPO PUBLIC SUMMARY

C 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	Yes	The CU has identified all waste products and sources of pollution. The environmental management plans were established to manage the identified waste products and source of pollution. Among the significant environmental receptors for the estates and mill operations were air emissions from boiler stack, vehicle & generator, GHG from anaerobic processes, water discharges from process and cleaning activities in the mill & boiler blowdown, scheduled wastes, domestic waste and process waste, clinical waste.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	Yes	The triple rinsing of the empty pesticide containers were continually implemented at Sogomana & Sungai Wangi estates. The rinsed containers were pierced and stored prior disposing. Records of inventory was verified and found to be satisfactory. The disposal of scheduled was carried out in Oct 2016 through licensed contractor. The consignment note was appropriately maintained.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	Yes	For the identified wastes and pollutants, there are Procedures and guideline established to guide the waste disposal activities and to reduce pollution on the routine operation. For FY2016/2017, the CU has established Waste Management Action Plan. Industrial @ mill process wastes had been disposed EFB were sent for mulching in the field, while crop residue/biomass i.e. fiber and shell were used as fuel in the boiler. On the water and effluent discharge, monthly and quarterly monitoring for final discharge were carried out and reported to DOE as per the JP requirements. Treated effluent from the Treatment Plant is discharged to the waterways. Result of analysis was found satisfactorily and below the stipulated limit. As for the scheduled waste management, a procedure on Handling of Scheduled Waste was established and implemented accordingly.
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	The CU has established the Energy Management Plan on efficiency use of fossil fuel. Among the programmes were using of fibre and shell in the boilers at the mill and for controlling of diesel usage in both estates for the tractor. The management is monitoring the consumption of fossil fuel and renewable energy on monthly basis. The management has plan to construct biogas plant on 2018 – 2020.
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 <i>'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003</i> . Major Compliance	Yes	Both estates practiced zero burning. During the visit to replant areas, it was evident that all palms were felled, shredded, windrowed left to decompose.
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in <i>'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003</i> . Minor Compliance	Yes	As per SDPSB policy on zero burning during land preparation for replanting, both estates had adhered to this policy. There was no evidence of any burning.
C 5.6 Preamble	5.6.1	An assessment of all polluting	Yes	Identification of polluting activities such as gaseous emissions, particulate / soot

RSPO PUBLIC SUMMARY

<p>Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized that it is not always feasible or practical to reduce or min. these emissions. Growers and millers commit to an implementation period until the end of Dec 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 s/holder groups of the RSPO. Plans to reduce pollution and emissions, including GHGs are developed, implemented and monitored.</p>		<p>activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).</p>		<p>emissions and effluent has been conducted and monitored.</p>
	5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance</p>	Yes	<p>Pollution Identification Environmental improvement action plan’ – is used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them are in place and are being reviewed accordingly. GHG potential sources is identified using ‘Carbon Reduction Plan’. Emission sources have been identified from Land Conservation, Fertilizer (mineral) Manufacture & Transport, NO from fertilizer, Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p>
	5.6.3	<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>	Yes	<p>GHG emission calculation and monitoring is available at Seri Intan CU level, using the RSPO Palm GHG Calculator. The CU has yet to submit calculation on its GHG emission for year 2016 to RSPO due to calculation still in draft.</p>

RSPO PUBLIC SUMMARY

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 including records of meetings shall be documented. Major Compliance	Yes	A Social Impact Assessment report and records of meetings were maintained by Seri Intan CU. The report was prepared in 2014 by the Social and Environment Projects Unit, PSQM Department, SDPSB. The assessment covered all estates under SOU 5. A separate assessment was carried out for the Seri Intan POM, in April 2013.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	Yes	At Sogomana, the stakeholder meeting conducted in May 2014 with head of nearby villages. At Sungai Wangi Estate and Sogomana Estate the stakeholders meeting was conducted in Mar 2014.
	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	Plans to avoid or mitigate the negative impacts and promotion of the positive ones had been established. The monitoring of impacts was established in consultation with the affected parties. A documented plan with time-tabled including responsibilities for implementation available in Sungai Wangi Estate, Sogomana Estate and Seri Intan POM.
	6.1.4	The plans shall be reviewed as a min. once every 2 yrs and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	Yes	Management Plan on Social Impact Assessment for Sungai Wangi Estate and Sogomana Estate have been reviewed for year FY2016/2017. Reviewed once a year with latest review in July 2016.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	Yes	There is no smallholder schemes in Seri Intan CU.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or	6.2.1	Consultation and comm. proc. shall be documented. Major Compliance	Yes	The CU maintained its consultation and communication procedures established by HQ, which were available at site.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	Yes	Sungai Wangi and Sogomana Estates have nominated the Assistant Manager as management official responsible for social issues in July 2016.
	6.2.3	A list of stakeholders, records of all communication, including	Yes	A list of stakeholders and records of communication, including confirmation of receipt and efforts made to ensure understanding by affected parties, and records of actions

RSPO PUBLIC SUMMARY

interested parties		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		taken in response to input from stakeholders was maintained at Seri Intan POM and both Sogomana and Sabrang Estate. The list of stakeholders at Sungai Wangi Estate and Sogomana Estate FY2016/2017 was reviewed by the auditor. During a meeting with the stakeholders in Feb 2016, there was a request from the village heads to request assistance to use tractor to repair the damaged roads. Based on interview with the representative from these villages, it was confirmed that action has been taken by the estate to repair the damaged road. Hence, previous Minor NCR KN01/2016 was satisfactorily closed. Sungai Wangi Estate has conducted stakeholders meeting with contractors in June 2016. For local communities, a stakeholders meeting is scheduled in Feb 2017 with 6 villages. Seri Intan POM has also planned the stakeholders meeting in Feb 2017.
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 req. Major Compliance	Yes	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. It was confirmed during consultation with head of 2 nearby villages. Auditor has verified during interview with workers and verification through complaint book at visited area, the complaint on line-site from January to December 2016 has been resolved effectively, timely and appropriate manner. Affected parties were informed of the status of repairing work in the complaint book. Sungai Wangi Estate, Sogomana Estate and Seri Intan POM have resolved all 2016 complaints/grievances from workers related with their living quarters. New complaints in 2017 which are related to workers quarters, the repairing work will be carried out in stages due to budget availability. Previous Major NCR KN02/2016 was satisfactorily closed.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	Yes	There was no dispute in Seri Intan CU. It was confirmed during the consultation with villages head and through review of the complaint book.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	Yes	The CU maintained its documented procedures for identifying legal and customary right and for identifying people entitled to compensation.
	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups'	Yes	The CU maintained its documented procedures for calculating and distributing fair compensation, which covered either by Procedures for Handling Boundaries Dispute or Procedures for Handling Squatters Dispute or Procedures for Handling Social Disputes, depending on type of issues and stakeholders. According to the procedure, the calculation and distribution of compensation to be carried out at the company level not at the estate/mill level. Nevertheless, no case of compensation related to loss of legal or customary rights of indigenous peoples, local communities or external stakeholders was observed.

RSPO PUBLIC SUMMARY

		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 was no land disputes in Seri Intan CU. It was confirmed during the consultation with the villages head.
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	Pay and conditions for workers were defined in the Collective Agreement between the Malaysian Agriculture Producers Association and the National Union of Plantation Workers while for the administrative staff, the pay and conditions were included in the CA between MAPA and the staff union (AMESU).
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	Yes	The job offer letter detailed the payments and conditions of employment and are consistent with the CA. According to the workers and staffs interviewed, when the current CA was first enforced the content of the agreement was also explained to them by the plantation management as well as union representative.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	Yes	Line-site inspection was conducted on weekly basis at Sungai Wangi and Sogomana Estate. Subsidized water supply from Lembaga Air Perak and electricity from TNB were provided to the workers quarters. Free medical, educational and other basic amenities such as Muslim prayer houses, Hindu temples and sundry shops were also provided.
	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	Sungai Wangi Estate and Sogomana Estate have monitored a sundry shop on the adequacy, sufficient and affordable food in February 2016. Price of all goods were displayed. Therefore, a Minor NCR KN03/2016 was satisfactorily closed.
C 6.6 The employer respects the rights of all personnel to form and join trade unions	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	Yes	The freedom of association statement incorporated in the company Social Policy (dated Jan 2015) statement together with other policy statements were maintained and sighted on notice boards in the estate and mill. It was confirmed during the consultation with workers during the site inspection.

RSPO PUBLIC SUMMARY

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 ind. and free association and bargaining for all such personnel.	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	Yes	Minutes of meetings with main trade unions or workers representatives were verified accordingly.
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	Auditor has verified through Employee Master Listing and interview with selected foreign and local workers at Seri Intan POM, Sungai Wangi Estate and Sogomana Estate that there were no workers below 18 years old.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local env. shall be documented. Major Compliance	Yes	The freedom of association statement incorporated in the company Social and Humanity Management Policy statement together with other policy statements (dated Jan 2015) were maintained and sighted on notice boards in the estates and mill.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	Yes	An inspection of the employment offer letters revealed no case of discrimination based on race, religion, gender, national origin or any other form of discrimination as stated in Criterion 6.8. The payments and conditions of employment for foreign or local, male or female employees were based on the MAPA-NUPW and MAPA-AMESU agreements and not decided arbitrarily by the estate/mill management. All workers, regardless of their socio-cultural and political backgrounds, were provided with the same housing and amenities as required by the law.
	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	An inspection of job advertisements and records of hiring and promotion showed that they were based on skills, capabilities, qualities and medical fitness. It was confirmed during interview with the employees.
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	The freedom of association statement incorporated in the company Social Policy and Social & Humanity Management Policy statement together with other policy statements were maintained and sighted on notice boards in the estate and mill.
	6.9.2	A policy to protect the reproductive rights of all,	Yes	The freedom of association statement incorporated in the company Social Policy and Social & Humanity Management Policy statement dated Jan 2015 together with other

RSPO PUBLIC SUMMARY

		especially of women, shall be implemented and comm. to all levels of the workforce. Major Compliance		policy statements were maintained and sighted on notice boards at the Sogomana Estate, Sungai Wangi Estate and Seri Intan POM.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and comm. to all levels of the workforce. Minor Compliance	Yes	A specific grievance mechanism which respects anonymity and protects complainants established, implemented through Group Policies and Authorities, and the staff in the CU were aware on this mechanism.
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 FFB shall be publicly available. Minor Compliance	Yes	This CU is certified as Identity Preserved, hence, the POM is not accepting any outsiders FFB from smallholders of other private plantation. Therefore, the mill is not required to display current and past prices for FFB.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	Yes	As per interview with FFB transporter and hardware suppliers, the visited estate and mill have briefed the agreement to the FFB transporters and hardware suppliers.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	Yes	Interview with FFB transporters and hardware suppliers have confirmed that they are understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	Yes	Based on interview with FFB transporters and hardware suppliers, and verification on tax invoices, delivery orders, purchase orders and purchase requisitions, it was noted that the payment was made in a timely manner through bank transfer after submission of complete documents in the MEX system.
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	Seri Intan CU had employed local communities that qualified for any vacant post at the estate or palm oil mill. Any request from head of village such as road repair or donation for temple and school had been approved by management. However, the approval will depend on the available balance from estate or mill's budget.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	Yes	There is no scheme small holder in Seri Intan CU
C 6.12 No forms of forced or trafficked	6.12.1	There be evidence that no forms of forced or trafficked labour are	Yes	Auditor has verified through interviews with foreign and local workers and review of record their contract agreements, work permits and passports. There was no evidence

RSPO PUBLIC SUMMARY

labour are used.		used. Major Compliance		of forced or trafficked labour in the CU.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	Yes	Auditor has verified through interviews with foreign and local workers and review of record their contract agreements, work permits and passports. There was no evidence of contract substitution in the Seri Intan CU.
	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 company labour policy required that all foreign workers hired by the company to attend a one-week post-arrival orientation course before commencing work. Through this course, the workers were exposed among other things to various relevant laws of the country, health and safety, work contract, sourcing process of foreign workers and language and cultures of Malaysia
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and comm. to all levels of the workforce and operations. Major Compliance	Yes	The SDPSB Social Policy and Social & Humanity Management Policy have included statement on freedom of association. The policies were displayed at the notice boards at the estates and mill.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	NA	This indicator is not applicable since the Seri Intan CU is located in Peninsular Malaysia.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

SOU Seri Intan has no plan for any new planting and no new development of area was observed during the visit. Thus Principle 7 is not applicable.

Clause	Indicators	Comply Yes/No	Findings	
C 7.1 A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning,	7.1.1	An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.

RSPO PUBLIC SUMMARY

management and operations.	7.1.3	Minor Compliance Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
C 7.2 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations	7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
C 7.3 New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values	7.3.1	There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.3.2	A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.

RSPO PUBLIC SUMMARY

		indicate changes to HCV status. Major Compliance		
	7.3.3	Dates of land preparation and commencement shall be recorded. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
C 7.4 Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.	7.4.1	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
C 7.5 No new plantings are established on local peoples' land where it	7.5.1	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.

RSPO PUBLIC SUMMARY

<p>can be demo that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a doc. system that enables these and other stakeholders to express their views through their own rep. institutions.</p>		<p>on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed by these local peoples. Major Compliance</p>		
<p>C 7.6 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</p>	7.6.1	<p>Documented identification and assessment of demonstrable legal, customary and user rights shall be available. Major Compliance</p>	NA	<p>There was no new planting at the Seri Intan CU during this audit as verified by audit team.</p>
	7.6.2	<p>A system for identifying people entitled to compensation shall be in place. Major Compliance</p>	NA	<p>There was no new planting at the Seri Intan CU during this audit as verified by audit team.</p>
	7.6.3	<p>A system for calculating and distributing fair compensation in place. Major Compliance</p>	NA	<p>There was no new planting at the Seri Intan CU during this audit as verified by audit team.</p>
	7.6.4	<p>Communities that have lost access and rights to land for plantation expansion given opp. to benefit from plantation dev. Minor Compliance</p>	NA	<p>There was no new planting at the Seri Intan CU during this audit as verified by audit team.</p>
	7.6.5	<p>The process and outcome of any compensation claims shall be doc. and made publicly available. Minor Compliance</p>	NA	<p>There was no new planting at the Seri Intan CU during this audit as verified by audit team.</p>
	7.6.6	<p>Evidence shall be available that the company has made adequate efforts to enable affected communities and rights holders to have access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the</p>	NA	<p>There was no new planting at the Seri Intan CU during this audit as verified by audit team.</p>

RSPO PUBLIC SUMMARY

		proposed operations on their lands. Minor Compliance		
C 7.7 No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.	7.7.1	There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.7.2	In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
C 7.8 <i>Preamble</i> New plantation developments are designed to minimize net greenhouse gas emissions.	7.8.1	The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. Major Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.
	7.8.2	There shall be a plan to min. net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options. Minor Compliance	NA	There was no new planting at the Seri Intan CU during this audit as verified by audit team.

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	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and		

RSPO PUBLIC SUMMARY

implement action plans that allow demonstrable continual improvement in key operations.		opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a min., these shall include, but are not necessarily be limited to: Major Compliance		
	a)	Reduction in use of pesticides(Criterion 4.6);	Yes	Both Sogomana Estate and Sg. Wangi Estate continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides the estates have established nurseries for beneficial plants. This was to ensure continuity in the planting of beneficial plants. The estates were committed to reduce using chemicals and now have implemented and will continue to only spray Circles and noxious weeds. Soft weeds and <i>Nephrolepis bisserata</i> are maintained and encouraged in the inter rows. Harvesters' paths are grass. This also suppresses growth of noxious weeds and thus reduce use of pesticides for selective weeding.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	Yes	Environmental Aspect Identification Summary FY 2016 / 2017 and Environmental Impact Evaluation Summary FY 2016 / 2017 were reviewed accordingly. Pollution Identification Environmental improvement action plan' has been established and is being monitored by the relevant appointed personnel.
	c)	Waste reduction (Criterion 5.3);	Yes	The Seri Intan CU continued to practice 3R (reduce, recycle, re-use) on waste management. Waste Management Plan has been established for 2016. They also segregated the waste from line site and waste was disposed through 'Majlis Daerah Teluk Intan'.The CU generally is active in recycling. This could be evident through sales of recyclable materials such as metal and paper.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	Yes	'Pollution identification environmental improvement action plan' is used to identify the waste products and sources of pollution. The plan has been reviewed accordingly.
	e)	Social impacts (Criterion 6.1);	Yes	The CU has allocated a budget on social aspect to solve identified issue as in the social action plan for 2017 such as continuous maintenance of workers quarters, road condition, playground equipment, mosque carpet and fogging programme.
	f)	Encourage optimising the yield of the supply base	Yes	Both estate are committed to implement best agricultural practices.

RSPO PUBLIC SUMMARY

Attachment 4

Detail of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken by the CU and Verification by Assessors
Indicator 2.1.3 NCR#: MZK 01 2017	Minor	Mechanism for ensuring compliance was not effective at Seri Intan POM. Objective evidence: (i) During 1, 28 and 29 June 2016, 2, 14 July 2016, 14 September 2016, and 14, 26 and 28 November 2016, the flowrate of treated effluent discharge exceeded the design capacity of the plant and there were no remarks noted in the form. (ii) Water Sampling at the monsoon drain pit was not carried out. Evidence of Boiler ash flowing to the drain.	<u>Corrective Action plan:</u> 1. In future, any result exceeded design capacity will be remarked/commented in the form. 2. Water sample at the monsoon drain pit has been sent to R&D Pulau Carey for analysis, and the sampling point will be added into the list of sampling points. Status: The corrective action and effectiveness of the implementation will be verified during next audit.
Indicator 4.1.2 NCR#: RR 01 2016	Minor	The recommendation made in the CHRA (2015) for sprayers and manures was not complied with. Objective evidence : At Sungai Wangi Estate: <ul style="list-style-type: none"> • Workers carrying circle spraying in some field not using respirators. • Medical surveillance was not carried out for manuring operators since 2015. 	<u>Corrective Action plan:</u> 1. Sprayers will be getting their respirators before second round of spraying, which is planned to be conducted in February 2017. 2. Manuring operators will be sent for annual medical surveillance in February 2017. 3. Person incharge to monitor workers' PPE and medical surveillance will be appointed by management. Status: The corrective action and effectiveness of the implementation will be verified during next audit.
		Plan to avoid or reduce pollution not effectively implemented. Objective evidence : <ol style="list-style-type: none"> 1. Bund for oil trap purposed not properly design. Traces of oil spills at Wilbrook Division, Sungai Wangi Estate, (inside and outside diesel storage). 2. At Wilbrook Division, Sungai Wangi Estate, diesel storage from replanting contractor does not have bund or trail to prevent oil spill occur. 3. At Sungai Wangi Estate (Wilbrook Division) water from emergency shower was directed into a field drain 4. At the Seri Intan POM, the emergency shower directed to monsoon drain 	<u>Corrective Action plan:</u> <ol style="list-style-type: none"> 1. Estate Management will reconstruct the bund for oil trap at Wilbrook Division by end of February 2017. 2. Replanting contractor will remove and vacate the diesel storage area, as they are not supposed to be storing any chemical or flammable liquid within the compound. 3. The drain at Sungai Wangi Estate will be reconstructed to enable the water to be directed into the sum. 4. At KKS Seri Intan, management will temporarily block the pipe to monsoon drain. Manual collection of the wastewater will be done and put into a carboy/drum. Status: The corrective action and effectiveness of the implementation will be verified during next audit.

RSPO PUBLIC SUMMARY

<p>Indicator 4.5.2</p> <p>NCR#: RR 02 2016</p>	<p>Minor</p>	<p>Training of those involved in IPM implementation was not demonstrated</p> <p>Objective evidence : There was no evidence to show that training of employees involved in IPM conducted at Sungai Wangi Estate.</p>	<p>Training of the employees involved in IPM will be conducted in February 2017.</p> <p>Status: The corrective action and effectiveness of the implementation will be verified during next audit.</p>
<p>Indicator 4.8.2</p> <p>NCR#: MZK 02 2017</p>	<p>Minor</p>	<p>The process of maintaining Training records found not effective.</p> <p>Objective evidence: At Seri Intan POM and Sungai Wangi Estate – Although Health, Safety and Environmental Trainings are stated to be carried out, however, some of the records of the training were not available.</p>	<p>Seri Intan POM and Sungai Wangi Estate will ensure all future trainings performed will be updated and recorded without fail in logbook or file form.</p> <p>Status: The corrective action and effectiveness of the implementation will be verified during next audit.</p>

RSPO PUBLIC SUMMARY

Attachment 5

RSPO Supply Chain at the Seri Intan Palm Oil Mill – Identity Preserved Model – Module D

Item No	Requirement NOV 2014	Findings Standard Nov 2014	
D.1 D.1.1	<p>Defination</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p> <p>To verify :</p> <p>a) the volume of certified FFB entering the mill b) the volume sales of RSPO certified</p> <p>The claim only the volume of oil palm products produced from processing of the certified FFB as IP</p>	<p>Actual (Jan 2016 – Dec 2016)</p> <p>a) Certified FFB received Certified FFB Processed CPO Production PK Production</p> <p>b) Delivery of CPO RSPO(IP) RSPO(MB) Non-certified Delivery of PK RSPO (IP) RSPO(MB) Non-certified</p>	<p><u>MT</u></p> <p>148,798.41 148,798.41 32,346.538 8,039.538</p> <p>32,257.16</p> <p>8,089.08</p>
D 2 D..2.1	<p>Explanation</p> <p>Estimate total tonnage of CPO and PK potentially produce in a year</p>	<p>Projection (Jan 2017 – Dec 2017)</p> <p>(1) FFB received (2) FFB Processed (3) CPO Production (4) PK Production</p>	<p><u>MT</u></p> <p>209,794.500 209,794.500 45,639.640 11,538.700</p>
D. 2 D 2.2	<p>Explanation</p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>Seri Intan POM has a registered RSPO e-Trace. The member ID is RSPO_PO1000000193 Sample of registration was sighted.</p>	
D 3 D 3.1	<p>Documented procedures</p> <p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in</p>	<p>a) Seri Intan POM had revised their documented procedure title '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>', version 2, dated March 2016. The procedure described the following:</p>	

RSPO PUBLIC SUMMARY

	<p>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>	<ul style="list-style-type: none"> • Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit • Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note , training record & contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos. • Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB • Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record • Clause 8.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified • Clause 9.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0025, • Clause 10.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product • Clause 11.0 ~ product claim – shall follow RSPO rules on market communication & claim • Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK. • Clause 13.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). • Clause 14.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded. • Clause 15.0 ~ Production volume <p>The procedure was kept in file RSPO Supply Chain Manual Appropriate changes were also made in the change from the previous Segregation to Identity Preserved model.</p> <p>b) The Assistant Manager remained as the person with overall responsibility for and authority over the implementation of the supply chain requirements.</p>
<p>D 3.2</p>	<p>The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Clause 7.0 of <i>SOP for Sustainable Supply Chain and Traceability</i>, version 2 has described how the Seri Intan POM manages the FFB from certified source. It was confirmed that no non-certified FFB was received by Seri Intan POM.</p>
<p>D.4 D.4.1</p>	<p>Purchasing and goods in The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Seri Intan POM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Seri Intan Estate, Sogomana Estate, Sabrang Estate and Sungai Wangi Estate. Monitoring record has recorded the tonnage of certified FFB and its supplying estate. There was no non-certified FFB received based on the records only Diversion from Certified Estate such as Bikam Estate and Flemington Estate.</p>
<p>D 4.2</p>	<p>The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>There was no overproduction of certified CSPO during the period under review (Jan 2016 – Dec 2016).</p>

RSPO PUBLIC SUMMARY

<p>D.5 D.5.1</p>	<p>Record keeping The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p>	<p>Seri Intan POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK.</p>
<p>D 6 D.6.1</p>	<p>Processing The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non- certified material including during transport and storage.</p>	<p>Global Trading & Marketing informed Sime Darby Plantation Sdn.Bhd – NURI Refinery (SDPSB-NURI) by e-mail on the dispatch of RSPO certified CPO from the supplying POM (Seri Intan). The dispatch of the RSPO certified CPO to SDPSB-NURI by the supplying POMs was made based on a specific contract. The receiving pit, pipelines and tanks in SDPSB-NURI were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO from Seri Intan POM. For traceability of a specific batch of RSPO certified CPO back to the supplying POM, SDPSB-NURI kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization issued by the POM.</p>
<p>D 6.2</p>	<p>The objective is for 100% segregated material to be reached.</p>	<p>Seri Intan POM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket and interview with weighbridge operator. Therefore, CPO and PK is 100% segregated.</p>

RSPO PUBLIC SUMMARY

Attachment 6

Status of Non-conformities Previously Identified

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.2.3 NCR#: STK1/2016	Minor	SOP for taking soil samples was not complied with. Objective evidence: At Sogomana Estate, the soil sampling was not carried out as per clause 4.3. The last sampling was done in May 2010.	Corrective actions by CU : 1. The schedule for soil sampling monitoring was carried out by R&D Research Centre and estate has been brief during the soil survey. 2. Trace email of soil sampling report by R&D Team and to keep in file. 3. Appoint person-in-charge in monitor and documented RSPO related reports by HQ.	Soil sampling / analysis has been carried out by the company research centre in Oct 2014. Status: Closed
Indicator 6.2.3 NCR#: KN01/2016	Minor	The confirmation of receipt and that efforts made to ensure understanding by surrounding kampong's, and records of actions taken in response to input from stakeholders was not evident. Objective evidence : 1. The head of village A was requesting to seek assistance of tractors on Jan 2015 and issues on road repairing at Sogomana Estate. However Sogomana Estate did not responded formally to this request. 2. The stakeholder consultation meeting with head of villages was not conducted for year 2015	Corrective actions by CU : 1) Letter requesting for assistance of tractors on Jan 2015 was only given to previous manager whom has resigned and this information was not cascaded down to the assistant and staffs. 2) Estate will conduct stakeholder meeting with all Ketua Kampung in the next meeting on March 2016. Meantime the road repairs will be done by the estate by patching the pot hole with crusher run as and when required.	Sogomana Estate has conducted a meeting with nearby villages in order to respond on the request made by the village heads to request assistance to use tractor to repair the damaged road. The meeting was held in Feb 2016. Based on interview with the representative from these villages, action has been taken by Sime Darby to repair the damaged road. Status: Closed
Indicator 6.3.1 NCR#: KN02/2016	Major	The complaints on 'living quarters' were not resolved in an effective, timely and appropriate manner. Objective evidence : The complaint on line site was not resolved in an effective, timely and appropriate manner. The affected parties were not informed the status of repairing work in the complaint book.	Corrective actions by CU : 1) There was communication breakdown. Information on repairing work will be done in stages due to budget constraint was not being communicated to all employees for repair that needs. 2) KKS Seri Intan conducted meeting with union representative to inform and explain on repairing work will be done in stages due to budget	Auditor has verified during interview with workers and verification through complaint book at visited area, the complaint on line-site from January to December 2016 has been resolved in an effective, timely and appropriate manner, and affected parties

RSPO PUBLIC SUMMARY

			<p>constraint. The meeting also discuss new issues regarding workers complaint that not being communicated through complain book.</p> <p>3) A person in charge was appointed in monitoring of complaints in complaint book and status of completion</p>	<p>were informed the status of repairing work in the complaint book. Sungai Wangi Estate, Sogomana Estate and Seri Intan POM have resolved all last year complaints/grievances from workers related with living quarters.</p> <p>Any new complaints in 2017 which are related with workers quarters, the repairing work will be done in stages due to budget constraint (budget cut by HQ).</p> <p>Status: Closed</p>
<p>Indicator 6.5.4</p> <p>NCR#: KN03/2016</p>	<p>Minor</p>	<p>Efforts to monitor and ability to, improve workers' access to adequate, sufficient and affordable food were not sufficient.</p> <p>Objective evidence: Efforts to monitor and ability to, improve workers' access to adequate, sufficient and affordable food were not sufficient at Sabrang Estate (2 shops), Sogomana Estate (1 shops) and Seri Intan POM (1 canteen).</p>	<p>Corrective actions by CU :</p> <p>1) No complaint have ever recorded or raised by staff or workers with regards in access of adequate, sufficient and affordable food from canteen or shops in relation to food cleanliness, pricing or variation of foods</p> <p>2) No complaints received from estate workers regarding the price at the estate shop as estate workers buy their groceries from the nearest town, Changkat Kruing that only 1km from workers quarters.</p> <p>3) All the list/price of grocery has been displayed at estate shops for monitoring purpose</p>	<p>Sungai Wangi Estate and Sogomana Estate have monitored a sundry shop on the adequacy, sufficient and affordable food in February 2016. Price of all goods were displayed. There was no complaint received from local and foreign workers' during interview with auditor.</p> <p>Status: Closed</p>

RSPO PUBLIC SUMMARY

Attachment 7

Time Bound Plan

SDP - RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11 Aug '20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4 Oct '21	CU-RSPO-815148, SPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17 Jun '21	SPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11	4 Oct '21	CU-RSPO-819144, SPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2 Mar '21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2 Mar '21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak		3 Mar '11	NA	NA	Withdrawn. Ceased Operation.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2 Mar '21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14 Apr '21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10	18 May '20	SPO 543543	
9	West	Carey Island, Selangor	19 May '10	18 May '20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Withdrawn. Ceased Operation.
10	Bukit Puteri	Raub, Pahang	7 Jul '16	6 Jul '21	CU-RSPO-815147, 18502206 001, 854 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '16	6 Jul '21	CU-RSPO-819155, 18502207 001, 854 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '16	6 Jul '21	CU-RSPO-819156, RSPO 928288, 854 502 14049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29 Dec '16	CU-RSPO-819163, SGS-RSPO/PM/MY13/01284, 854 502 14039	Recertification of Labu POM is in progress. PalmTrace License is valid till end of March 2017 in the PalmTrace system.
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18 May '20	SPO 541905	

RSPO PUBLIC SUMMARY

15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb '14	17 Feb '19	SPO 600305, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '16	6 Jul '21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	19 May '10	18 May '20	RSPO 005	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4 Oct '21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28 Jan '14	27 Jan '19	SPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19 Oct '15	SPO 550182	Withdrawn. Ceased Operation.
20	Chaah	Chaah, Johor	18 Nov '10	17 Nov '20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18 May '20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4 Oct '21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '16	10 Apr '21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28 Mar '21	824 502 16040	
25	Segaliud	Sandakan, Sabah	20 May '10	19 May '15	SPO 547123	Withdrawn. Ceased operation.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30 Sep '18	SPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20 Jan '21	SPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12 Jul '20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12 Jul '20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12 Jul '20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24 May '10	NA	NA	Withdrawn. Ceased operation.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Withdrawn. Ceased operation.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29 Dec '21	CU-RSPO-819166, MUTURSP0/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '16	29 Dec '21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30 Dec '11	29 Dec '21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29 Dec '21	CU-RSPO-815150, MUTURSP0/054	

RSPO PUBLIC SUMMARY

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16 Jan '12	16 Jan '17	MUTU-RSPO/011	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6 Jul '11	6 Jul '16	MUTU-RSPO/006b	Mill closed down.
3		MUSTIKA OIL MILL		3 Jul '13	3 Jul '18	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9 Nov '16	8 Nov '21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16 Mar '12	16 Mar '17	MUTU-RSPO/014	
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2 Sept '16	1 Sept '21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRA RIAU	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9 Jul '12	9 Jul '17	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25 Nov '10	24 Nov '20	MUTU-RSPO/002	
9	PT PARI PURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/016	
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	5-Jul-11	5-Jul-16	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16 Mar '12	16 Mar '17	MUTU-RSPO/017	
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30 Dec '11	30 Dec '16	MUTU-RSPO/009	Recertification of Rantau POM is in progress. PalmTrace License is valid till end of Feb 2017 in the PalmTrace system.
13		BETUNG OIL MILL		1 Apr '14	1 Apr '19	MUTU-RSPO/035	

RSPO PUBLIC SUMMARY

14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23 Nov '10	22 Nov '20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16 Mar '12	16 Mar '17	MUTU-RSPO/015	
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11 Sep '12	11 Sep '17	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9 Sept '16	8 Sept '21	MUTU-RSPO/004	
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg.Guntung, Indragiri Ilir, Riau	1 Dec '16	30 Nov '21	MUTU-RSPO/008	
19		MANDAH OIL MILL		1 Apr '14	1 Apr '19	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8 Dec '16	7 Dec '21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10 Jul '12	10 Jul '17	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18 Jul '16	17 Jul '21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMA/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3 May '13	3 May '18	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3 Jul '14	2 Jul '19	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat	NA	NA	NA	Pending certification by RSPO EB.