SIRIM QAS INTERNATIONAL	**SIRIM QAS INTERNATIONAL SDN. BHD.** Building 4, SIRIM Complex, No. 1 ,Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia. **RSPO PUBLIC SUMMARY REPORT**	**File Ref.: ES10171014**

CLIENT : **SIME DARBY PLANTATION BERHAD – SOU 32 RAJAWALI**

PARENT COMPANY : **SIME DARBY PLANTATION BERHAD**

RSPO MEMBERSHIP NO.: 1-0008-04-000-00

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

Certification Unit	Mill / Supply Base	GPS Location		Location
		Latitude	Longitude	
SOU 32 Rajawali	Rajawali Palm Oil Mill	N 3° 22' 14.4"	E 113° 24' 1.1"	97011 Bintulu, Sarawak
	Rajawali Estate	N 3.42595°	E 113.37900°	97008 Bintulu, Sarawak
	Samudera Estate	N 3° 28' 55.0"	E 113° 23' 51.0"	97012 Bintulu, Sarawak
	Semarak Estate	N 3.22536°	E 113.35600°	97011 Bintulu, Sarawak
	Bayu Estate	N 3° 28' 56.0"	E 113" 23' 51.0"	97012 Bintulu, Sarawak

MAP : See Attachment 1

AUDIT DATE : **9-13 October 2017** **DURATION :** **13.5 auditor days**

TYPE OF AUDIT : [X] **Annual Surveillance Audit No. 1** [ ] **Recertification Audit**

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

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

VALIDITY OF RSPO CERTIFICATE : 30/12/2016 – 29/12/2021

The following attachments form part of this report:

Non-conformity Report(s) [X] List of additional site(s) [ ]

Report by Audit Team Leader		**Acknowledgement by Client's Representative**	
Name	: Rozaimee Ab Rahman	Name	: SIME DARBY PLANTATION (SARAWAK) SDN. BHD. RAJAWALI PALM OIL MILL
Signature	:	Signature	: KOGULANATHAN SUBRAMANIAYAN MILL MANAGER
Date	: 16 January 2018	Date	: 26/01/18

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit					
On-site audit date	:	19th – 23rd September 2016		No. of auditor days :	13.5 Auditor days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Jagathesan a/l Supiah, Selvasingam T. Kandiah,			
No. of major NCR	:	-	Indicator: -		Closing date : -
No. of minor NCR	:	5	Indicator: 4.1.2, 4.1.3, 4.8.2, 5.2.3, 5.2.4		
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers	Suppliers
		X			X
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
			X		
Supply base sampled	:	Semarak & Samudera Estate			
Report approved by	:	Aminah Ang		Approval date : 20/12/2016	

Annual Surveillance Audit 1					
On-site audit date	:	9-13 Oct 2017		No. of auditor days :	13.5 Auditor days
Audit team	:	Rozaimee Ab Rahman (TLA), Mohd Zulfakar Kamaruzaman, Hazani Othman			
No. of major NCR	:	3	Indicator: 2.1.1, 4.4.2 & 4.5.3 (certification system)		Closing date :12/12/17
No. of minor NCR	:	2	Indicator: 2.1.3, 4.6.10		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers	Suppliers
		X		X	x
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
			x		
Supply base sampled	:	Rajawali & Bayu Estate			
Changes since the last audit	:	No change.			
Report approved by	:	Radziah Mohd. Daud		Approval date : 16/01/2018	

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

RSPO PUBLIC SUMMARY REPORT

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 :					
Report approved by :				Approval date :	

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF INFORMATION

TABLE 1

	~~STAGE 2~~ / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Sept 2016 – Aug 2017	Oct 2017 – Sept 2018			
Certified FFB Processed (MT)	174,801.72	175,617.77			
Production of Certified CPO (MT)	38,456.37	44,785.82			
Production of Certified PK (MT)	8,225.39	8,679.21			
Certified Areas (Ha)	14,493.00	14,315.01			
Planted Areas (Ha)	9,851.22	9,851.22			
Production Areas (Ha)	8,676.65	7961.55			
HCV Areas	-	-			
REMARKS	-	177.99 ha certified area taken by government to construct Pan Borneo highway and BDA project			

TABLE 2

	PO	PK
Last years certified volume (MT)	38,456.37	8,225.39
Last years actual certified sold (MT)	0.00	7,800.00
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	34,068.30	311.50
New year certified volume (MT)	44,785.82	8,679.21

Table of contents

		Page
1.0	AUDIT PROCESS	6
	1.1 Certification body	6
	1.2 Qualification of audit team	7
	1.3 Audit methodology	7
	1.4 Stakeholder Consultation	7
	1.5 Audit plan	7
	1.6 Date of next audit	7
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)	8
	2.3 Organization Information / Contact Person(s)	12
3.0	AUDIT FINDINGS	13
	3.1 Changes to certified products in accordance to the production of the previous year	13
	3.2 Time bound plans including changes and reasons for the changes see below	13
	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)	13
	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.	14
	3.5 Any new acquisition which has replaced primary forests or HCV areas	14
	3.6 Other changes (e.g. organizational structure, new contact person, addresses, etc.)	14
	3.7 Status of previous non-conformities * (refer to Attachment 6)	14
	3.8 Complaint received from stakeholder (if any)	14
4.0	DETAILS OF NON-CONFORMITY REPORT	14
	4.1 For P&C (Details checklist refer to Attachment 3)	14
	4.2 For SC (Details checklist refer to Attachment 5)	14
5.0	AUDIT CONCLUSION	14
6.0	RECOMMENDATION	15

List of Attachments

Attachment 1	:	Map of Rajawali CU	16
Attachment 2	:	RSPO Surveillance Audit Plan	17
Attachment 3	:	RSPO P&C Audit Checklist And Findings	23
Attachment 4	:	Details of Non-conformities and Corrective Actions Taken	50
Attachment 5	:	RSPO Supply Chain at the palm oil mill – Identity Preserved model – Module D	52
Attachment 6	:	Status of Non-conformities Previously Identified	55
Attachment 7	:	Time-bound Plan	57

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**
Rozaimee Ab. Rahman	Auditor Team Leader / Good Agricultural Practices, Environment and occupational health and safety	Holds a B. Sc. Of Agriculture. He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C.
Mohd Zulfakar Kamaruzaman	Auditor / Supply chain, Environment and occupational health and safety	Holds a B. Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation.
Hazani Othman	Auditor / Social and HCV	Holds a Bachelor of Forestry Science and Diploma in Forestry, from the Universiti Putra Malaysia. He is a lead auditor for ISO 14001, FSC & MTCC FMC and CoC and RSPO P&C.

1.3 Audit methodology

The audit covered the Rajawali Palm Oil Mill and two of its supply bases. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The two supply base covered during the audit are Rajawali and Bayu Estates. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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

1.5 Audit plan:

Refer to Attachment 2.

1.6 Date of next audit:

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Rajawali Certification Unit (CU) is one of the the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad. (SDP). The CU is also known as SOU 32 and consisted of Rajawali Palm Oil Mill (RPOM), Rajawali Estate, Samudera Estate, Semarak Estate and Bayu Estate. The CU is located about 100km from Bintulu town and is accessible via the Bintulu-Miri Road.

Rajawali POM commenced its operations in 1993 with a processing capacity of 60 metric tonnes of (FFB) per hour. The total combined land area of the four estates is 14,315.01 hectares (Ha) of which 9,851.22 Ha had been planted with oil palm. All the estates within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable.

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

The FFB is sourced from company owned estates that were certified. 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
(Oct 2016 – Sept 2017)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Rajawali	43952.11	27.09	SIRIM
Samudera	37187.59	22.92	SIRIM
Semarak	37961.27	23.40	SIRIM
Bayu	43129.07	26.59	SIRIM
Total	**162, 230.04**	**100.00**	**SIRIM**

Table 2: Projected FFB production by the supply base for the next reporting period
(Oct 2017 to Sept 2018)

Estates	FFB Production	
	Tonnes	Percentage (%)
Rajawali	51,577.93	29.36
Samudera	37,556.74	21.39
Semarak	42,000.00	23.92
Bayu	44,483.10	25.33
Total	175,617.77	100.00

Table 3: Actual FFB received and CPO & PK dispatch by the Rajawali POM for the last reporting period
(Oct 2016 – Sept 2017)

	Total (MT)
FFB Received	162, 230.04
FFB Processed	162, 230.04
Certified FFB	162, 230.04
Non Certified FFB	0.00
CPO Production	34,068.30
PK Production	8,111.50
CPO delivered as Identity Preserved	0.00
CPO delivered as non-RSPO certified	34,068.30
PK delivered as Identity Preserved	7,800.0
PK delivered as non-RSPO certified	311.50

Table 4: Projected FFB received and CPO & PK dispatch by the Rajawali POM of the next reporting period (Oct 2017 – Sept 2018)

	Total (MT)
FFB Received	175,617.77
FFB Processed	175,617.77
Certified FFB	175,617.77
Non Certified FFB	0.00
CPO Production	44,785.82
PK Production	8,679.21
CPO delivered as Identity Preserved	44,785.82
CPO delivered as non-RSPO certified	0.00
PK delivered as Identity Preserved	8,679.21
PK delivered as non-RSPO certified	0.00

Table 5: Planted and certified area of the Rajawali CU

Estate	Planted (ha)	Certified (ha)
Rajawali	3374.71	6,868.01
Samudera	2050.38	2,608.00
Semarak	2242.78	2,598.00
Bayu	2183.35	2241.00
Total	**9,851.22**	**14,315.01**

Table 6: Planting profile for Rajawali CU

Estate	**Year of establishment**	**Mature (Ha)**	**Immature (Ha)**	**Planted area**	**% of planted area mature**	**% of planted area immature**
Rajawali Estate	1993	2,650.84	723.87	3,374.71	78.55	21.45
Samudera Estate	1998	1,798.11	252.27	2,050.38	87.70	12.30
Semarak Estate	1993	1,584.63	658.15	2,242.78	78.71	21.29
Bayu Estate	1997	1,927.97	255.38	2,183.35	88.30	11.70
Total		7961.55	1,889.67	9,851.22	82.65	17.35

Table 7 (a): Planting profile for Rajawali Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1st	Mature	363.37	10.77
1996	1st	Mature	1292.96	38.31
1997	1st	Mature	354.47	10.50
00RA	1st	Mature	85.76	2.54
02SA	1st	Mature	39.68	1.18
03SA	1st	Mature	41.60	1.23
04SA	1st	Mature	56.56	1.68
2013	2nd	Mature	206.32	6.11
2014	2nd	Mature	210.12	6.23
2015	2nd	Immature	289.59	8.58
2016	2nd	Immature	194.83	5.77
2017	2nd	Immature	239.45	7.10
Total			**3,374.71**	**100**

Table 7 (b): Planting profile for Samudera Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	1st	Mature	759.56	37.05
1999	1st	Mature	214.46	10.46
2000	1st	Mature	824.09	40.19
2016	2nd	Immature	252.27	12.30
Total			**2,050.38**	**100**

Table 7 (c): Planting profile for Semarak Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1993	1st Generation	Mature	245.11	10.93
1994	1st Generation	Mature	883.20	39.38
1995	1st Generation	Mature	194.58	8.68
1996	1st Generation	Mature	154.21	6.88
2004	1st Generation	Mature	107.5	4.79
2016	2nd Generation	Immature	375.39	16.74
2017	2nd Generation	Immature	208.26	9.29
2018	2nd Generation	Immature	74.50	3.32
Total			**2,242.78**	**100**

Table 7 (d): Planting profile for Bayu Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	1	Mature	587.05	26.89
1999	1	Mature	217.75	9.97
2000	1	Mature	1093.12	50.07
2006	1	Mature	8.90	0.41
2008	2	Mature	5.85	0.27
2010	2	Mature	15.30	0.70
2017	2	Immature	255.38	11.70
Total			**2,183.35**	**100%**

2.3 **Organizational Information/Contact Person**

The details of the contact person is as shown below:

Name	:	Mr. Jayaganesh Dharmaseelan
Position	:	Estate Manager
Address	:	Sarawak Zone Office Rajawali Complex, KM 52, Jln Bintulu-Miri, P.O. Box 673, 97008, Bintulu, Sarawak Rajawali Estate, P.O Box 673, 97008 Bintulu, Sarawak, Malaysia
Phone no.	:	+6086-477313/019-4591967
Fax no.	:	+6086-477313
Email	:	ldg.rajawali@simedarby.com

3.0 AUDIT FINDINGS

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

There was no change to the certified products since last assessment.

3.2 Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)

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

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

Internal Audit dated in 18 Dec 2017 was conducted based on RSPO Partial Certification Requirements. No non-compliance was observed by the organization. It has been noted that SDP was progressively undergoing the RSPO Certification process towards 100% RSPO certification of their estates/mills.
PT MAS (Indonesia) has undergone the RSPO Main assessment and was delayed due to some social disputes. The certification of this CU was subject to the progress of the matter being resolved. With regards to the engagement with the RSPO, it was evident that the RSPO Secretariat was well informed on the progress through regular briefing and progress reports. The latest meeting with RSPO Secretariat was held on 8 Sept 2016. To-date, 9 progress reports were submitted to RSPO and the latest was dated on 30 June 2016. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29

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

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

N/A

iii.	Are there associated smallholders (including scheme smallholders) in the CU		Yes	√	No
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?		Yes	√	No
	If no, please state reasons	Not applicable. There is no associated smallholders supplying FFB to the CU.			
iv.	Any new acquisition which has replaced primary forests or HCV areas		Yes	√	No
	N/A				

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

Sime Darby Plantation Sdn Bhd has been changed to Sime Darby Plantation Berhad.

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

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

3.5. Complaint received from stakeholder (if any)

No complaints from stakeholders were observed.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 4)	List : 2	MZK 03-2017, RAR 01-2017
Total no. of major NCR(s) (details refer to Attachment 4)	List : 3	MZK 01 & 02-2017, RAR 02-2017

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

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

☐ No NCR recorded. Recommended to continue certification.

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

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

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

☒ Recommended to continue certification.

☐ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

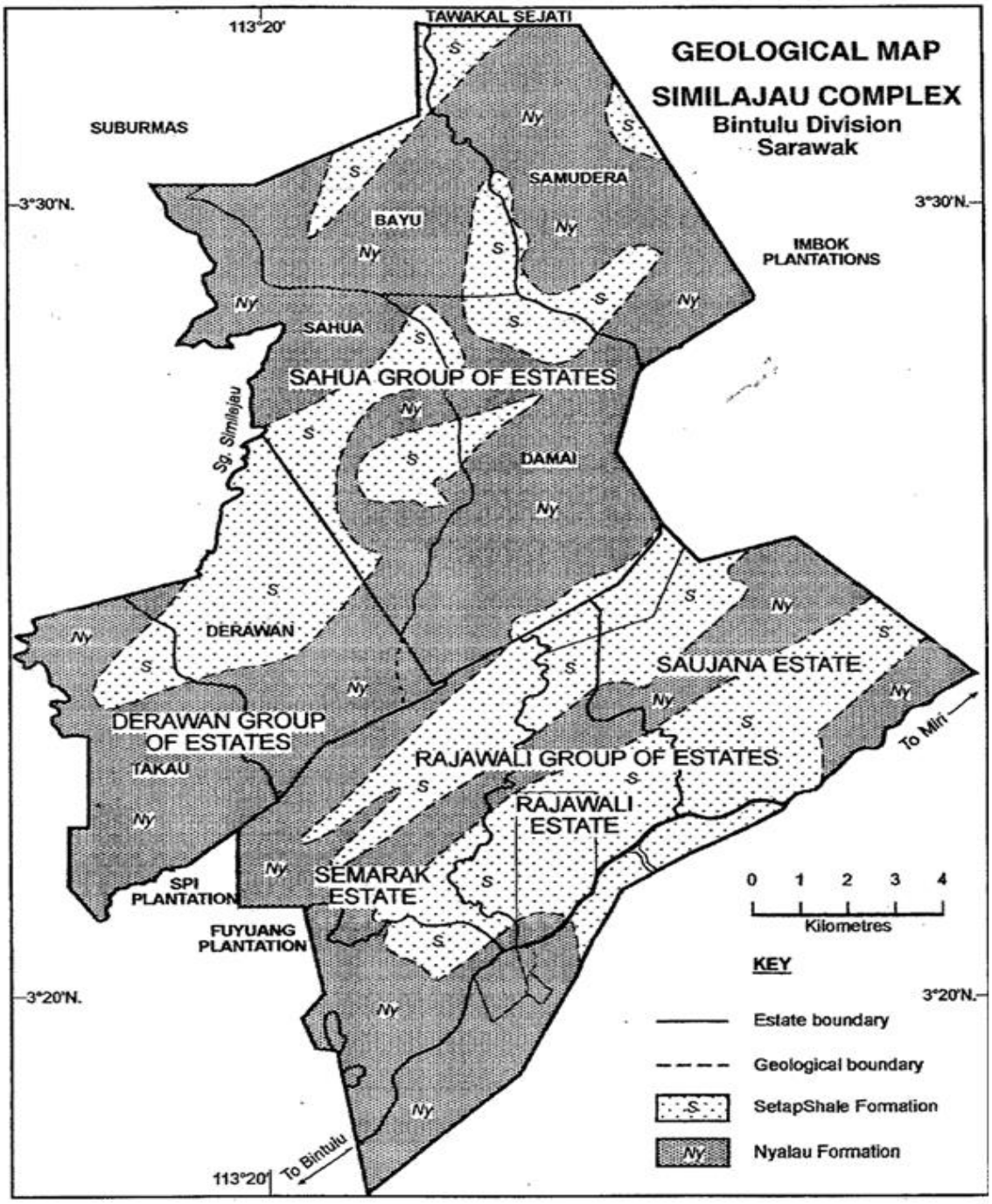
Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.

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

Audit Team Leader :	ROZAIMEE BIN AB RAHMAN		12/12/2017
	(Name)	(Signature)	(Date)

Attachment 1

Location map of Rajawali Certification Unit, Bintulu



Attachment 2

RSPO SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the assessment are as follows:

(i) To evaluate **SOU 32 Rajawali** 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 : 9-13 October 2017

3. Site of assessment : SOU 32 Rajawali

- Rajawali Palm Oil Mill
- Rajawali Estate
- Bayu Estate

4. Reference Standard:

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

5. Assessment Team

Assessor: Rozaimee Bin Ab Rahman (GAP, Env, Safety)
Mohd Zulfakar Kamaruzaman (Env, Safety, SC)
Hazani Othman (HCV, Social)

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.
For minor non conformities raised in the surveillance audit, corrective action plans shall be submitted within 30 days and these shall be upgraded to major non conformities if the corrective actions are not implemented in the next audit.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM

QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia

11. Reporting

a)	Language	:	English
b)	Format	:	Verbal and written
c)	Expected date of issue	:	6 weeks after the closure of the Major NC / or if only minor NC, 4 weeks from the last day of this audit.

12. Facilities Required

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

13. Assessment Programme Details : As below

Day 1:09 October 2017 (Monday)

Time	Activities / areas to be visited			Auditee
8.30 – 9.00 am	Opening Meeting at Rajawali Palm Oil Mill Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes.			
9.00 – 9.30 am	**Organization representative to brief on the following:** 1) RSPO implementation at SOU 32 Rajawali (i.e. mill & supply base) including changes 2) Time bound plan for Sime Darby Plantation Berhad. 3) Significant changes on organization activities, machinery, supply bases capacity etc.			Management Representative
9.30 - 1.00 pm	**Rozaimee**	**Zulfakar**	**Hazani**	
	Rajawali Estate Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 • Laws and regulations • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Interview with workers and contractors • Environmental management – witness activities at site	**Rajawali POM** Coverage of assessment: P1, P2, P4, P5, P7, P8 • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with FFB supplies and other supplies • Interviews with mill's workers • Facilities at workplace • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programmes. • Continuous improvement	**Bayu Estate** Coverage of assessment: P1, P2, P4, P5, P6, P8 • Laws and regulations • Land titles user rights • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders	Guide(s) for each assessor.
1.00 – 2.00 pm	**LUNCH BREAK**			All
2.00 – 4.30 pm	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each auditor
4.30.- 5.00 pm	Audit team discussion / End of Day 1 audit			

Day 2: 10 October 2017 (Tuesday)

Time	Activities / areas to be visited			Auditee
8.30 - 1.00 pm	**Rozaimee**	**Zulfakar**	**Hazani**	
	<u>Rajawali Estate</u> Continue coverage of assessment: • Waste & chemical management • Chemical store/fertilizer • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programmes.	**<u>Rajawali POM</u>** Continue coverage of assessment: P1, P2, P4, P5, P7, P8 • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with FFB supplies and other supplies • Interviews with mill's workers • Facilities at workplace • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programmes. • Continuous improvement	**<u>Bayu Estate</u>** Continue coverage of assessment: • Check pay slip, Contract Agreement • Check Sundry Shop • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement	Guide(s) for each assessor.
1.00 – 2.00 pm	**LUNCH BREAK**			All
2.00 – 4.30 pm	Continue assessment	Continue assessment	**<u>Rajawali Estate</u>** coverage of assessment: P1, P2, P4, P5, P6, P8 • Laws and regulations • Land titles user rights • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders	Guide(s) for each auditor
4.30.- 5.00 pm	Audit team discussion / End of Day 2 audit			

Day 3: 11 October 2017 (Wednesday)

Time	Activities / areas to be visited			Auditee
8.30 - 1.00 pm	**Rozaimee**	**Zulfakar**	**Hazani**	
	<u>Bayu Estate</u> coverage of assessment: P1, P2, P3, P4, P5, P7, P8 • Laws and regulations • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Interview with workers and contractors • Environmental management – witness activities at site	**<u>Rajawali POM</u>** Continue coverage of assessment: P1, P2, P4, P5, P7, P8 • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with FFB supplies and other supplies • Interviews with mill's workers • Facilities at workplace • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programmes. • Continuous improvement	**<u>Rajawali Estate</u>** Continue coverage of assessment: • Check pay slip, Contract Agreement • Check Sundry Shop • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement	Guide(s) for each assessor.
1.00 – 2.00 pm	**LUNCH BREAK**			All
2.00 – 4.30 pm	**Rozaimee**	**Zulfakar**	**Hazani**	Guide(s) for each auditor
	Continue assessment	Continue assessment	**<u>Rajawali POM</u>** coverage of assessment: P1, P2, P4, P5, P6, P8 • Laws and regulations • Land titles user rights • Social Impact Assessment (SIA), management plan & implementation • Complaints and grievances • Consultation with relevant government agencies • Interview workers, Contractors, gender committee, local communities and stakeholders	
4.30.- 5.00 pm	Audit team discussion / End of Day 3 audit			All

Day 4: 12 October 2017 (Thursday)

Time	Activities / areas to be visited			Auditee
8.30 - 1.00 pm	**Rozaimee**	**Zulfakar**	**Hazani**	
	<u>Bayu Estate</u> Continue coverage of assessment: • Waste & chemical management • Chemical store/fertilizer • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programmes.	**<u>Rajawali POM</u>** Site visit and assessment on Supply Chain Implementation including the Model used • 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 • Claims	**<u>Rajawali POM</u>** Continue coverage of assessment: • Check pay slip, Contract Agreement • Check Sundry Shop • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighboring land use • Riparian zone • Continuous improvement	Guide(s) for each assessor.
1.00 – 2.00 pm	**LUNCH BREAK**			All
2.00 – 4.30 pm	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each auditor
4.30.- 5.00 pm	Audit team discussion / End of Day 4 audit			All

Day 5: 13 October 2017 (Friday)

Time	Activities / areas to be visited			Auditee
	Rozaimee	**Zulfakar**	**Hazani**	
8.30– 10.30 am	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 auditor
10.30- 11.00pm	Break			
11.00- 12.00 pm	Closing meeting			

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	Rajawali CU had continued to implement the communication procedure as had been described and established for estates and mill. At the point of audit, there was no request for information from the stakeholders received by the CU. The CU also has established mechanism to channel such queries through regular meetings with workers. Various issues and complaints were heard by the management and decisions made for subsequent action. In addition to those, SDP continued to use the 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 available at SDP website at http://plantation.simedarby.com.
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	SOU Rajawali had identified personnel responsible for handling of complaints. Records of communication were maintained at respective offices. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the communication file. At the point of this assessment, there has been no request for such information by the public.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1	Land titles/user rights (Criterion 2.2);	YES	The right to use the land at Rajawali CU clearly demonstrated and not disputed by any party. Documents related to land ownership i.e. land titles and payment of quit rent were made available at the respective visited offices.
		Occupational health and safety plans (Criterion 4.7);	YES	Occupational Health & Safety Plan titled 'Occupational Safety & Health Plan 2017' has been established. Indicators set in the plan are being monitored. The audit on the progress monitoring of the programs identified is as in C 4.7 below.
		Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	Environmental and social impact assessment, management action plans, and continuous improvement plan for Rajawali SOU of Estate and mill maintained available by the CU.
		HCV documentation summary (Criteria 5.2 and 7.3);	YES	Documentation relating to HCV observed maintained available.

		Pollution prevention and reduction plans (Criterion 5.6);	YES	The list of waste generated from estate and mill activities maintained available. All sources of pollution have been identified by management (Pollution Prevention Plan 2017/2018). Mitigation measure and action taken also made available.
		Details of complaints and grievances (Criterion 6.3);	YES	Management document relating to social observed maintained. However, no complaint and grievances observed.
		Negotiation procedures (Criterion 6.4);	YES	Management document relating to social observed maintained. However, no case of negotiation observed.
		Continual improvement plans (Criterion 8.1);	YES	Continual improvement plans maintained available. The continuous improvement plans was established and updated accordingly by the Executives from the Sustainability Department. Sime Darby Plantation Berhad is committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. Details of the CU continual improvement plans have been reported in indicator 8.1. Among the continual improvement plans reviewed were: (a) Pollution Prevention Plan – FY2017/18. (b) Identification and Management of Wastewater – FY2017/18. (c) Waste Management Plan – FY2017/18. (d) Environmental Improvement Plan - FY2017/18. (e) Water reduction Plan - FY 2017 / 18. (f) Safety and Health Program - FY 2017 / 18
		Public summary of certification assessment report;	YES	Public summary can be assessed through this link: http://www.sirim-qas.com.my/core-files/uploads/2016/08/PUBLIC-SUMMARY-ASA-4-RAJAWALI-IP_170316.pdf.
		Human Rights Policy (Criterion 6.13).	YES	Policy relating human right observed maintained.
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	Policy committing to a code of ethical conduct and integrity observed and the document maintained available to all employees as displayed at each office.

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	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	NO	Generally, SOU Rajawali continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licences and permits were verified at SOU Rajawali. However, it was found that there was no health surveillance carried out for workers who were working in Confined Space. Therefore, Major NCR MZK 01 2017 was raised. This is not in accordance with that stipulated in the Code of Practice in Confined Space 2010.

ratified international laws and regulations.	2.1.2	A documented system, which includes written information on legal requirements shall be maintained Minor Compliance	YES	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. The PSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	NO	The CU had a documented system for identifying, updating changes to legal requirements and to monitor the status of legal compliance in their EQMS & MQMS (Estate & Mill Quality Management System) included under the Standard Operation Manual. There was evidence of compliance to legal requirements and that it had been evaluated on an annual basis. These compliances were also ensured by PSQM Internal Audits, PA visits and by RSPO Audits. The CU has conducted internal audit to check status of compliance with legal requirements on 12/8/2017. Nevertheless, it was noted that trap at the monsoon drain was not functional and broken. Evidence of Sludge Oil flowing to the drain sighted. Water Sampling also was not carried out at the Final discharge monsoon drain. Therefore, Minor NCR MZK 02 2017 was raised against this indicator.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	PSQM department, which is based in Kuala Lumpur is responsible for tracking any changes to the Acts and Regulations. This was done through communicating with the publisher of the documents. This mechanism was outlined in its procedure. The updating of the legal register was carried out on a periodical basis. Any change in the law was disseminated to all CUs which then updates its legal register from time to time.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised Native Customary Right (NCR) land) and the actual legal use of the land shall be available. Major Compliance	YES	The CU observed maintained copy of relevant land titles. It was evident that the land quit rent paid accordingly.
	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	The CU maintained visible boundary trench and pole marking (white & red).
	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	YES	No case of dispute observed.

		with free, prior and informed consent (FPIC). Minor Compliance		
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. Major Compliance	YES	No case of land conflict was observed.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities and relevant authorities where applicable). Minor Compliance	YES	No case of conflict or dispute was observed
	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	No case of conflict or dispute was observed
C 2.3 Use of the land for oil palm does not diminish the legal,customary or user rights of other users without their free,prior and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties. Major Compliance	YES	No customary or user rights of other users was observed.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and	YES	No customary or user rights of other users was observed.

		that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance		
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	YES	No customary or user rights of other users was observed.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	No customary or user rights of other users was observed.

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

Clause	Indicators		Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	Both estates continued to commit to long–term economic and financial viability. The annual budgets for 2017/18 to 2019/2020 were sighted. The budget covers 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 m ton & per ha.
	3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance	YES	The long-range replanting programme (LRRP) until 2026/27 were sighted for both Estates. This programme was reviewed once a year and 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 (SOPs) for estates and mills shall be documented. Major Compliance	YES	SOU 32 Rajawali, the SOPs for each of the process had continued to be implemented. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs. In general, the practices in the CU had been carried out as per the Plantations / Mill Quality Management System (PQMS / MQMS) standard operating manual and procedures (SOP), Sustainable Plantation Management System (SPMS) Manual, Supply Chain Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, Laboratory Process Control Manual and Security Guidelines. The documents include all aspects of the operation in the estates and mill, which is from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and despatch of CPO, PK and PKO as well as security of the SOU.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	The mechanisms to check the implementation of procedures were carried out through internal audit, safety and health meeting and routine inspection by assistant manager, staff and hospital assistant. In additional team QA from HQ has conducted quarterly monitoring regarding on quality of implementation procedure such as loose fruit collection, harvested bunch left and unharvested bunches. PA visits were also used to check the implementation.

	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Records of monitoring and the actions taken by the estates continued to be maintained. This was to ensure that the established procedures were consistently implemented.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Fresh Fruit Bunches were supplied from SDP owned estates which are certified to RSPO. There was no third-party FFB sent to the mil.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	Both Estates practised the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application. Fertiliser application, which is important for the maintenance of soil fertility was carried based on the recommendation made by the internal Agronomist. Annual fertiliser recommendations were made based on annual foliar sampling and 5 yearly soil sampling.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance		Fertiliser inputs were based on recommendation made internal Agronomist. The visit was carried to cover all the oil palm field and the findings were used as guidance in formulating the fertilizer input and recommendation on good agricultural practices to improve growth and subsequently the FFB yield. The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilisers were available. Records showed that actual applied in 2017 was in line with recommendations in both estates.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Both Estate have conducted periodic tissue and soil sampling to monitor changes in nutrient status. Recommendations were made in the near future.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues. Minor Compliance	YES	Both estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose. EFB were also applied as a mulching system in replanting areas to prevent from growth of weeds and to keep a moisture.
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 map provided, there was no fragile/marginal soils in both audited estates.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	SDP had a management strategy in place for planting on slopes to minimise and control erosion and degradation of soils. The strategy in place for plantings on slopes between 9 and 25 degrees was in the Slope & River Protection Policy, Buffer Zone & 25degree slope and in item 8 Section 4 and Land Preparation for Terracing in ARM Manual. It was observed that practices to minimise and control erosion and degradation of soils were also advocated through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crop was observed planted in the replants.

	4.3.3	A road maintenance programme 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 (own), back hoes and compactor were rent from Sime Darby Industry (SDI). For resurfacing crusher run was purchased. Surface run off water from roads is directed into fields and road side drains. De-silting of drains was carried out with excavators. For Rajawali Estate, road maintenance programme 2017/2018 was sighted.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	Not applicable. No peat soils observed in both estates.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance		There were no peats soils in both estates.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance		There were no problematic soils in both estates. Refer to soil types at 4.3.1
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		Both estates continued to be guided by the CU Water Management Plan which was developed in order to maintain availability of natural water resources. The plan was update on July 2017 included practicing efficient water consumption through various methods such as minimising wastage of treated water and pollution prevention to the natural water sources
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated Major Compliance	NO	SOU 32 continues to implement their SOP and Policy on maintenance of the riparian zone. The buffers had been identified in accordance with Department Irrigation and Drainage. Interviews with the workers revealed that they understood the requirement of keeping the riparian zones free from any agricultural activities such as application of fertilizer and chemical weeding. Site visit was conducted to verify the protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate. SOU 32 had maintained the protection on water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estate. However, during site visited at Bayu Estate infringement of buffer zone was sighted near the nursery area. Thus, major# NCR RAR 02 2017 has been raised. The oil palms seedlings have been located at the edge of an eroding river bank, leading to the loss of nursery land and to the direct flow of pollutants into the river.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge	YES	Site visit at effluent treatment plant and interview with operator in charge was revealed the operation was in accordance with standard operation procedure and legal requirements. No sight of effluent over flow and flow meter reading was recorded daily.

		quality, shall be in compliance with national regulations (Criteria 2.1 and 5.6). Minor Compliance		Rajawali POM records of water monitoring for DOE submissions were available for viewing. Outgoing water into waterways is being closely monitored. Water sampling analysis on quarterly basis as stipulated in the procedure. The results of all parameters were below than the stipulated limit.
	4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance	YES	Processing water obtained from Sungai Similajau, the use of water in the mill was monitored awith the average consumption at 1.07m^3/month.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM techniques.	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	The implementation of IPM by planting beneficial plant such as tunera subulata, cassia cabenensis and antigonan sighted along the main road. Record of new planting were reviewed accordingly. Rat population were control using a 1st generation bait. In additional BOB (ratio 1:53) has been implemented to control rats' population in the estate.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	At Rajawali Estate - IPM training (beneficial plant) and Pest & Disease were conducted in May and June 2017 respectively by PSQM. As for Bayu Estate, the training LCC was conducted internally by the estate management in Sept 2017. Records of training were available for verification.
C 4.6 Pesticides are used in ways that do not endanger health or the environment	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	Written justification in Standard Operating Procedure of all agrochemical was available in Section 15 and 16 of the Agricultural Reference Manual and in the Safety Pictorial Book prepared by Sime Darby Plantation Berhad. The use of selective products that are specific to the target pest, weed or disease were demonstrated in the Agricultural Reference Manual (AGRM). Chemical registers indicate the purpose of usage (intended target), hazards signage, trade and generic names.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance	YES	Both estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and 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. Both estates had documented programs for spraying pesticides and for rat baiting.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance		As part of the IPM plans, the management of both estates had established nectariferous beneficial plants (*Cassia cobanensis, Antigonan leptopus,Turnera sublata,and Mucuna bracteata)* nurseries for continuous planting in order to attract natural predators and thus reducing the use of insecticides. As mentioned in 4.5.1, observed that Beneficial Plants and LCC were planted. Both estates had plants ready for planting in the nurseries.
	4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam	YES	Both estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii & class iv. The use of paraquat had been banned in all SDP estates. There was no evidence of pesticides

		Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance		that are categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met.
	4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the CSDS training. It was also noted that CSDS are available at all sites during the audit and record of training was available for verification. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors
	4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	YES	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust fans and the door was secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were segregated accordingly. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.

	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	As mentioned under 4.6.5 pesticides were handled only by trained personnel. Chemical was premixed before transported to the fields for spraying. The PPE issuance records confirmed that PPEs were replaced as and when required.
	4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practiced by both estates. There was no evidence to show that any had been carried out. Both estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs.
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or 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. Attendance list was available for all the training carried out.
	4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated. Minor Compliance	NO	In Rajawali POM, the Scheduled Wastes (Hazardous Waste) Management has been established. Based on Environmental Impact Evaluation and Environment Aspect and Impact Identification improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination. However, it was noted that at Bayu and Rajawali Estate, the action plan to mitigate the negative impact was not properly implemented by the management. Based on record of disposal clinical items sighted clinical items were disposed only once per year. Also sighted a poor management on bottles, lubricant drums, and iron at contractor workshop and parking areas. Thus, Minor #NCR RAR 01 2017 has been raised.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	Rajawali POM The medical surveillance was carried out in Aug & Oct 2017 by certified OHD. But the report from clinic was not yet received. Rajawali Estate and Bayu Estate All sprayers, store keepers, foremen, water treatment operator and workers handing pesticides in both estates were sent for annual medical surveillance and the records were reviewed by the audit team. Relevant workers were sent for medical surveillance in Aug 2017. The results for blood test, cholinesterase test, baseline test, and urinefame test was satisfactory and all workers was fit to handling chemical.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in both estates. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. Monitoring of pregnancy and lactating was conducted on every month by the estate HA.

C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	SOU Rajawali continued to have in place and adopt SDP Occupational Safety and Health Policy, signed by Dato, Franki Anthony Dass. The policy was also available in Bahasa and had been communicated to all employees through briefings and being displayed on the estates notice boards. It was also communicated to all workers by the workers representative in OSH committee. A safety and health plan for 2017/2018 named Environment, Safety & Health Program was updated on 1 July, 2017 for the Rajawali SOU has been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, etc. Generally, the ESH program noted to be satisfactory.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	The CU had identified the significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. At the estates, among the HIRARC carried out covered activities like chemical mixing and spraying, chemical storage, harvesting and FFB collection and vehicle maintenance. At both Bayu Estate and Rajawali Estate the last review was carried out in June 2017 and Feb 2017 respectively, to include replanting activities and used of new mechanization. Full review of the HIRARC was conducted by the ESH committee. Rajawali POM reviewed their HIRARC in July 2017. Most significant and routine activities for mill and estate were adequately covered including chemical spraying, harvesting in the estates, boiler operation, FFB sterilisation, kernel extraction and oil extraction and clarification in the mill. Appropriate risk control measures had been determined and implemented for the respective activities and operation in the estates. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative control was sighted with safety signages were displayed at all work stations including mill and estates office and workshop. On overall performance, OSH administrative controls implementation as well as appropriate risk control measures were identified and a PIC was assigned to monitor the implementation of the control measures during field and site assessment.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Training and Briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner.
	4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings	14	Rajawali POM Responsible Person for Environment Safety Health – Mill Manager and Assistant Engineer.

		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		Safety and Health Committee organization was established in July 2017. With Workers and Management representation i.e. Chaired by the Mill Manager and the Assistant Engineer as the Committee secretary. Discussion on the following were noted; Passing of previous minutes and arising matters, Hospital Assistant Report (Monthly Accident statistics), Mill Health & Safety Inspection Report, Welfare issues and Training & Safety related activities. The quarterly basis meetings were carried out accordingly. <u>Bayu Estate and Rajawali Estate</u> Regular safety meetings between the responsible persons and workers about safety and health were conducted. Safety Committee Meeting chaired by Estate Manager has been conducted once in three months by all audited operating units. The meeting minutes were made available at the estate offices.
	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	SOU Rajawali had adhered to the documented: SDP policy 'Crisis Management & Emergency Response' plan and OSH manual and "Accident and Reporting and Investigation Procedure, Local Medical Evacuation Plana and SOP for Medical treatment Appendix 5.5.3.3. Both Estates Rajawali and Bayu had the policies for Fire, Flood, Chemical spillage, Strikes and Emergency and Accident Response in both English and Bahasa exhibited and exhibited in office, Muster Ground, Workshop and Dispensary. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and exhibited on notice boards. Telephone numbers of the Police Station, Fire Brigade, Immigration Department and Hospital were also exhibited. The team, consisting of trained First Aiders, were Field Staffs, Mandores, Office Staff, Work shop Operator and Security personnel. The First Aid kits at the Stations were checked and found to be satisfactorily maintained.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	SOU Rajawali provides Medical care to Group Estate workers thru the estates' clinic established within the premises and more serious cases are referred to Hospital Bintulu which is about 50 Km from the Estates and Mill. SOU Rajawali had continued to provide a group insurance for all workers as required under the Workmen Compensation Act 1992. Sighting of records and cross check with workers showed that they were covered with valid insurance policy; Local Workers were covered by SOCSO and Foreign Workers were covered by Workmen Compensation.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Accident statistics are being maintained and periodically reviewed during 'Health and Safety' committee meeting – minutes reviewed.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programmes for 2017/2018 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Rajawali POM and both estates Rajawali and Bayu. Year 2017/2018 Training Plan was established in July 2017. 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	YES	SOU Rajawali had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Training records verified. Records of trainings conducted were maintained accordingly.

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

Clause	Indicators		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	SOU Rajawali has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment. Established for 2017/ 2018 dated in July, 2017. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. 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	Rajawali POM Environmental Aspect and Impact Identification Form & Environmental Impact Evaluation Form was used to identify Aspect & Impact and take necessary action. The record was reviewed in Oct 2017 by the Assistant Engineer and approved by the Mill Manager. No changes were made to the record. Waste Management Plan FY 2017 / 2018 comprising of Pollution Prevention Plan 2017/2018 has been established in Sept 2017. Among the pollution prevention being identified are control of black smoke emissions, monitoring water course, Schedule Waste and effluent discharge monitoring. Sighted records of monitoring by the mill. Rajawali and Bayu Estates No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	YES	Rajawali and Bayu Estates For FY 2016/2017 both estate have decided to minimize chemical usage in some area such as: i. to reduce usage of insecticide and pesticide (cypermethrin) by establish of pheromone trap and orevention of pest breeding area by doing good agricultural practices during replanting – ensuring thin chipping of trunks and all trunk debris must stack in close ended trenches ii. to prevent of usage of chemical class 1 (methamidaphos) for control bagworm by planting more beneficial plants and change to acephate. iii. to reduce usage of rat bait by establishing and maintaining barn owl boxes. Rajawali POM Pollution Identification Environmental improvement action plan' to monitor the effectiveness of the mitigation measures taken, are in place. The following indexes are being monitored : Black Smoke Monitoring, Effluent Discharge Monitoring, Monitoring Water course and Centralized collecting Schedule Waste. Y2016/2017 Performance verified, noted to be satisfactory

C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management,shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). Major Compliance	YES	The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. The report of assessment contained in “High Conservation Value (HCV) Final Report (Version 2.0), June 2017”. The assessment had identified Sg. Similajau in Bayu Estate and Sg. Sigrok and water catchment (for mill use) as conservation areas respectively.
	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	No RTE species were observed, except HCVs areas of identified rivers. Relevant action plans had been established and implemented concerning protection of the rivers, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police.
	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	Relevant programme to workers pertaining awareness of HCV areas and RTE observed conducted. Among evidence of programme include trainings, such as HCV Training for Sarawak Region and HCV Awareness for Workers. Other programme also instituted, such as erection of signage pertaining prohibition of activities for protection of RTE and conservation areas.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	The CU observed implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) observed maintained.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally	YES	No HCV set-asides with existing rights of local communities were observed.

		safeguards both the HCVs and these rights. Minor Compliance		
C 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	SOU Rajawali has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2016/2017 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were: Air – sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission)- GHG , Water – cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. Land – scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	YES	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented as discussed in Indicator 5.1.3 above. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. Mill wastes had been disposed as follows; EFBs 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 monitoring of water and effluent discharge, a monthly and quarterly report for final discharge were submitted to DOE in a timely manner, as required by the written approval. On the scheduled waste management, Rajawali SOU had a procedure “Handling of Scheduled Waste” established and the procedure was complied with 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	A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2017, identified in the following i) Environmental Aspect Identification Summary FY 2017 / 2018 reviewed accordingly. ii) Environmental Impact Evaluation Summary FY 2017 / 2018 reviewed accordingly. Fossil fuel Reduction Plan for FY 2017 / 2018 was established and monitored. To Reduce Diesel usage – by maintenance of the boiler & machineries to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler. Trend of higher consumption ratio with lower yield or production noted. Rajawali POM had planned to install SESCO line to reduce usage of Diesel with expected to completed on June 2018. For the estates, to manage high usage of fossil fuel for machineries, these were carried out: • to carry out scheduled maintenance for machineries to unsure diesel and lubricant usage is at optimal level and in good condition. • to brief workers during muster briefing on how to reduce diesel usage. Example turn off engine when not in used. • to carry out road maintenance programme as planned to ensure it is always in good condition to ease tractor movement.

				Skid tank management: • to ensure all equipment for loading and unloading diesel in good condition. • to ensure no spillage and leakages • to ensure nozzle is always locked when not in used to avoid unauthorized diesel filling.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the *'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003*. Major Compliance	YES	SDP has a policy of no open burning. As advocated, both estates practiced Zero burning. In the 2016 replants visited during the audit in both Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in *'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003*. Minor Compliance	YES	There was no evidence fire has been used for preparing land for replanting in both estates. The estates had adhered to the Zero Burning Policy of SDPSD.
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized that it is not always feasible or practical to reduce or minimise these emissions.	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate / soot emissions and effluent.	YES	An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. 'Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution – is in place and is being reviewed accordingly. The most significant environmental receptors for the estates and mill operations were: Air – Source from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission) Water – Cleaning water/run-off/process station waters (hydrocyclone / claybath / sterilizer condensate / clarification waste) & boiler quenching water and blowdown. Land – Scheduled waste, domestic waste and industrial/process waste.
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them are in place and are being reviewed accordingly. The GHG potential sources were being identified using 'Carbon Inventory Calculation Methodology. Emission Sources have been identified from Land Conversation, Fertilizer (mineral) Manufacture & Transport, NO from fertilizer, Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.
	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	RSPO made compulsory for submitting GHG starting from 1/1/2017. Rajawali CU had used RSPO PalmGHG Calculator as a tool. Sighted report send to RSPO on 5/05/2017. The final emissions value per product are as below:

Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO.
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

Milling extraction rate:

OER	22.3%
KER	5.92%

Mill Emission

Own Crop		
Emission sources	tCO2e	tCO2e/FFB
POME	38222.93	0.22
Fuel consumption	2297.58	0.01
Grid electricity utilisation	0	0
Credits	0	0
Export of excess electricity to housing & grid	0	0
Sale of PKS	0	0
Sale of EFB	0	0
Total	**40520.51**	**0.24**

Plantation / field emission

Own Crop			
Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB
Land Conversion	95578.62	9,88	0.57
*CO2 Emissions from Fertiliser	421.61	0.04	0
**N2O Emissions	5423.29	0.56	0.03
Fuel Consumption	3872.28	0.4	0.02
Peat Oxidation	1266.89	0.13	0.01
Sinks	0	0	0
Crop Sequestration	-88686.52	-9.16	-0.53
Conservation Sequestration	0	0	0
Total	**17876.17**	**1.85**	**0.11**

The final emissions value per product are:

CPO	1.29 tCO2e/tCPO
PK	1.29 tCO2e/tPK

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

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The CU maintained documented SIA, including records of meetings. The information of SIA contained in "Social Impact Assessment Report, SOU 32 Rajawali, 5-9/9/16" report. The assessment covered all units in Rajawali. Attendance list identified that the assessment had be participated by various stakeholders, e.g. different type of workers, surrounding communities, neighbouring plantations and smallholders, suppliers, contractors. Minutes of meetings were available.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	The assessment observed had be participated by various affected stakeholders, e.g. different type of workers surrounding communities, suppliers, contractors, etc.
	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	The CU observed maintained established and implemented SIA action plan. Among of issues and action plans were: review for streamlining of employees' fringe and benefit with Peninsular Malaysia, suggestion for revising salary scheme for Sarawak Zone, saving scheme through salary deduction, explanation of calculation of pay for work on rest day, CU provide letter of clarification and liaise directly with Immigration Department for those foreign workers having difficulty for retuning to home country due to long renewal process for foreign workers, CU established schedule and number of trips concerning limited seats of provided transport for workers to go to town on payday, clarification on OT limitation, briefing for foreign workers's bonus and establishment and display of Hospital Assistant's duty timetable.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	YES	The CU noted practices to review SIA plan at least annually. The last review for the CU was on July 2017.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	No smallholders included in the CU.
C 6.2 There are open and transparent methods for communication and consultation between growers	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	The CU noted maintained documented consultation and communication procedures with stakeholders.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The CU noted maintained Assistant Manager at each operating units as management official responsible for social issues. Appointment letter at each operating units noted available.

and/or millers, local communities and other affected or interested parties	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	The CU noted maintained documented list of stakeholders. Among of stakeholders identified were different type of workers, surrounding communities, neighbouring plantations and smallholders, suppliers, contractors, government agencies. The list noted also contain relevant name of person, address and phone number.
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 whistle blowers, where requested. Major Compliance	YES	The CU maintained complaint, grievance and dispute system opened to affected parties. However, no complaint was observed.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	No complaint was observed.
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 observed maintained for identifying legal, customary or user rights, and a procedure 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' proof of legal versus communal ownership of land. Minor Compliance	YES	The CU maintained procedure for calculating and distributing fair compensation.

	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	No case of compensation to affected parties were observed.
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	The CU maintained documentation of pay and conditions in payslip and employment contract. Employee wages and benefits noted met Minimum Wages Order 2016 and employment contract.
	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	Conditions of employment contained employment contract. Among other the employment contract contain wages, benefits, working hours, leaves, accommodation, transportation, period of notice, etc. The employment contract available in English, Bahasa Melayu and Indonesian, which able to understand by local and foreign workers. Observed that the CU had decided to replace announced SEA Games Public Holiday to another date. However, the selected date was cancelled due to raining on that day itself. Thus, the CU has decided to replace the public leave to another day. But, the date has yet to be re-announced.
	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	The CU continued to provide adequate house, water and electricity supplies, medical, welfare amenities etc., which met the applicable law. Noted that there were no complaints with regards to this.
	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	The CU continued monitor price of sundry shops in the estate. Each shops submitted their price to management as well as price of goods are displayed. No complaint of exorbitant price was observed.
C 6.6 The employer respects the rights of all personnel to form	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	The CU maintained policy for recognizing freedom of association. The policy displayed at each operating unit office.

and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	There was no union in the CU. However, the CU continued to practice meeting with workers representative. Minute of meeting with workers was available.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The CU maintained to document employee profile in database. The database contained listing of employees. Among information contained were date of birth, date joined, nationality, etc. No employee under minimum age was observed.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	The CU maintained policy of equal opportunities. The policy displayed at each operating unit office. No discrimination was observed.
	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	The CU maintained policy of equal opportunities. No discrimination was observed.
	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	There were new general foreign workers observed employed. Among the employment requirement is based on medical fitness. Noted that those new foreign workers had examined by independent clinic and determined fit to work.
C 6.9 There is no harassment or abuse in the work place, and	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 CU maintained policy concerning sexual harassment and violence. The CU also maintained to have meeting covering matter related to sexual harassment and violence. However, no case was observed.

reproductive rights are protected.	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The CU maintained policy concerning protecting reproductive rights. The CU also maintained to have meeting covering matter related to protecting reproductive rights. However, no case was observed. Interviewed with women sprayer confirmed they aware of their reproductive right and confirmed no issue.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, & communicated to all levels of the workforce. Minor Compliance	YES	The CU maintained grievance mechanism which respects anonymity and protects complainants. However, no case was observed.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	The CU continued to source FFB only from own certified supply bases. Thus, publicly available of current and past price not relevant to the CU.
	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	The CU continued to source FFB only from own certified supply bases. Thus, mechanism of FFB pricing not relevant to the CU. Nevertheless, for other pricing mechanism, the CU continued to procure through quotation or tender procedure depending on input / service to procure.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviewed with suppliers and contractor observed they understand and satisfied with their business relationship with the CU.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Interviewed with suppliers and contractor observed they understand and satisfied with their business relationship with the CU, including their payment. No issue concerning payment was observed
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.Minor Compliance	YES	The CU continued to contribute to local communities through Corporate Social Responsibility programme. Noted latest programme was improvement of workers housing complex, i.e. repainting of houses, *surau*, etc.
	6.11.2	There are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	Not applicable. No scheme smallholders included.

C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	Observed there were no evidence of forms of forced or trafficked labour been used. Employees observed being employed and treated as per applicable legal requirements and contract of employment. Passport of foreign workers were handed-over to the CU voluntarily for safe keeping. Handed-over records were available. Employees interviewed confirmed no issue of forms of forced or trafficked labour, and pertaining keeping of their (foreign workers) passport.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	No contract substitution was observed. Foreign workers interviewed confirmed they had no other contract and treated as per contract signed with Sime Darby.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	The CU maintained policy concerning temporary or foreign workers. Foreign workers observed being treated as accordingly as per the policy.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	The CU maintained policy to respect human right. The relevant policy noted visibly displayed at each office of operating unit.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES	The CU continued support for education for children of foreign workers. Each operating units provide free transport for children of foreign workers for their education to centralised Community Learning Centre (CLC) in the CU.

Principle 7: <u>RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS</u>

Rajawali CU has no plan for any new planting and no new development of area was observed during the visit. Auditor has verified through www.globalforestwatch.com , google map and map provided by visited estate including site visit, there was no new planting at the Rajawali SOU. Thus Principle 7 is not applicable.

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

Clause	Indicators		Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: Major Compliance		
	a)	Reduction in use of pesticides(Criterion 4.6);	YES	The CU adopted several continuous improvement in reducing of pesticides i.e. increasing planting of beneficial plants mainly *Tunera subulata, Cassia cobanensis* and *Antigonon leptopus* and continue to monitor pest through Early Warning System. The CU also adopted planting of *Legominious* Cover Crop mainly *Pueraria Javanica* and *Calopogonium Mucunoides* at replanting area in order to minimizing circle and selective weeding. *Neproliphis biserata* was maintained and encouraged to be planted in Rajawali SOU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	Environmental impact assessment, management action plans and continuous improvement plan for Rajawali SOU has been updated and monitored by management. Among the improvement actions: (a) construction of sump at chemical and workshop to prevent ground or water contamination. (b) collect back chemicals bags and allocate store for control of misused. (c) use of tray for tractor parking and workshop stations to prevent ground contamination
	c)	Waste reduction (Criterion 5.3);	YES	The management of Rajawali SOU had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and genset / water treatment plant to prevent any leakage and problem which can impact on smoke emission.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.

	e)	Social impacts (Criterion 6.1);	YES	The CU continued to improve the social impacts with activities like implementation of retention incentive for foreign workers, constructing sheltered at morning muster area, upgraded of *surau* and audio system, organized social events for worker and communities, such Workers' Day celebration together with The Best & Beautiful House competition and Family Day in May 2017.
	f)	Encourage optimising the yield of the supply base	YES	To optimise yields, both estates implemented best agricultural practices, inclusive of: timely and proper fertiliser application and EFB & Compost application, improving on accessibility to maximize crop evacuation, expanding in field mechanized collection of FFB, constructing water bodies and water conservation pits to conserve moisture, reducing surface run off to prevent leaching of fertilisers and paying harvesters incentives.

RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

Clause	Indicators		Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. PT MAS in Indonesia has undergone RSPO Main assessment and was delayed due to some social disputes. The target date for certification was by 2017 subject to the progress of the matter being resolved. As at June 2017, 58% of smallholders land from the total land of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020. Liberia Preparation to undergo the RSPO Certification process was also in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. SDP continues to work on direct engagement with Project Affected Communities (PAC) – working towards a consensus with the PAC to resolve the issues. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the	YES	Time bound plan was verified by CB and it can be confirmed that there were no changes to the current time bound plan as verified during this audit.

shall be raised;		moment of first involvement and shall only check continued appropriateness;		
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce;	YES	There were no changes to the current time bound plan as verified during this audit.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1st January 2010 shall comply with the RSPO NPP. For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	Regular discussion was ongoing between Sime Darby Plantation and the group of community through bi-monthly meeting since November 2012; TKKP and the Kerunang & Ketapang team. The most recent one was held in Nov 2016. Issues related to the demands made by TKPP were closed except for two items related to land matters where SDP was engaging with the local authority on this matter together with TKPP. Current discussion was to moving forward especially on the replanting activities. SDP visited the second community group, the Kerunang & Entapang team in Aug 2014 to listen and have a better understanding on their requests. The subsequent meeting with the communities was held in Dec 2014.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on internal and external audit (ISPO certified) there was no labour disputed recorded at the CU.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	SDP PT Mitral Austral Sejahtera was ISPO certified by MUTU Certification International in Nov 2017 and there was no issue on legal non-compliance for all uncertified unit.

	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		• A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement.	NO	During the audit, there was only progress report (dated in Sept 2017) to RSPO on complaint filed against PT Mitra Sejahtera, but no reports to show compliance for another requirement as required by this certification system document. NCR MZK 01 2017 was issued for further information on how SDP address this requirement. Records for internal audit was not available during the audit.
		• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.
		• Desktop study e.g. web check on relevant complaints	YES	Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29
		• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	YES	There was no non-compliance found for all requirements during this audit

Note:
1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.
For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;
2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

Attachment 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 NCR MZK 02 2017	Major	Findings: There was non-compliance against industry code of practice for working in a confined space area 2010. No health surveillance has been done for entrance confined space (2 years once) as per industry code.	Currently Rajawali POM have carried out Medical Surveillance for Workshop, Boiler, Store, WTP, ETP and Lab personnel. It was found that Health Surveillance for confine space not carried out due to lack of knowledge regarding Industry Code of Practice for Working in a Confined Space Area, 2010. Rajawali Mill management already sent personnel to do Health Surveillance for confine space on 10th October 2017.	Sighted the following supporting documents as evidence of the corrective action had been taken. Five workers were sent for medical surveillance for confined space to OHD certified doctor and clinic. **Status Closed.**
2.1.3 NCR MZK 03 2017	Minor	Findings: Buring site visit it was found that trap at the monsoon drain was not function and broken. Evidence of mineral oil flowing to the drain. Water sampling also was not carried out at final discharge monsoon drain.	Rajawali mill already install plate to block oil flowing out to monsoon drain. Mill also activate oil trap in production line to trap any oil from discharge into main monsoon drain and also will send drain sample to ESI for monitored of discharged.	Social aspects related to replanting has been assessed through JCC meeting with workers on 10/8/17. Minute of meeting and updated SIA report verified. **Status: the implementation will be verified next audit**
4.4.2 NCR RAR 02 2017	Major	Finding: During site visit at Bayu Estate infringement of buffer zone was sighted at Sungai Perihas Reserve near the nursery area.	Estate already marked and planted grass at the buffer zone area. In the future, it will be patrolling recorded and briefing to contractors regarding buffer zone.	Sighted a picture at buffer zone area near the nursery has been planted with natural grasses. The location of polybags has been transfer and buffer zone area has been marked and pegging to prevent from encroachment. **Status Closed.**

4.6.10 NCR RAR 01	Minor	Finding: -At Bayu and Rajawali Estate - housekeeping (bottle, lubricant drums, and iron) at contractor workshop and contractor parking area was very poor. -At Bayu Estate – clinical waste items were disposed only once per year.	To give awareness training to all drivers and contractors regarding housekeeping of contractor parking area. 2. To ensure all machine provided with oil tray, 3. To brief and ensure all schedule waste item i.e. used filter, used oil, and others to be keep at schedule waste. 4. Regularly monitoring and checking by Medical Assistant and Assistant Manager In-Charge. 5. Training to Hospital Assistant (HA) and ensure he sent the clinical waste in 180 days. For the next planning, centralize clinical waste at Rajawali Estate Clinic.	Sighted a picture contractor workshop has been keep and monitored regularly, all item such as scheduled waste has been storage properly and also clinical waste has been monitored by assistant manager to assist HA for handling clinical waste. **Status: the implementation will be verified next audit**
RSPO Certification System Document (2007) NCR MZK 01 2017	Major	Finding: There was only progress report to RSPO on complaint filed against PT Mitra Sejahtera (PT Mas) dated 8 September 2017, but no reports to show compliance for another requirement. This is not in accordance with the system requirement where the (i) positive assurance statement, which is based upon self-assessment (i.e. internal audit) by the organization. This would require evidence of the self-assessment against each requirement, were required.	Internal assessment to review the certification system requirement has been carried out on 9-10/11/2017. With regards to the land dispute issue, the RSPO Secretariat has been well informed on the progress through regular briefing and progress reports. The latest meeting with the RSPO Secretariat was held on 8/9/2016. As of to-date, nine progress reports were provided to RSPO, with the most recent report was submitted on 30th June 2016. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29	Internal assessment has been carried out on 9-10/11/2017 by PT Mas. SDP PT Mitral Austral Sejahtera was already ISPO certified by MUTU Certification International on 30/11/2017. It was concluded that there was no issue on HCV, legal non-compliance and labour disputes, for all uncertified units. With regards to the land disputes, the action to address the issues were on-going. Engagement between SDP and the two relevant communities and stakeholders were evident. Communication between SDP and RSPO EB was also reviewed and it can be confirmed that the process to remediation unresolved issues were in progress. **Status : Annual updated report will be verified for next audit**

Attachment 5

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

Item No	Requirement NOV 2014	Findings Standard Nov 2014
D.1 D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable. To verify : a) the volume of certified FFB entering the mill b) the volume sales of RSPO certified The claim only the volume of oil palm products produced from processing of the certified FFB as IP	**Actual (Oct 2016 – Sept 2017)** MT a) FFB Received **162,230.04** RSPO 162,230.04 Non-RSPO 0 FFB Processed **162,230.04** RSPO 162,230.04 Non-RSPO 0 CPO Production 34,068.30 PK Production 8,111.50 b) Delivery of CPO **34,068.30** RSPO(IP) 0 Non-RSPO 34,068.30 Delivery of PK **8,111.50** RSPO (IP) 7,800.00 Non-RSPO 311.50
D 2 D.2.1	**Explanation** Estimate total tonnage of CPO and PK potentially produce in a year	**Projection (Oct 2017 – Sept 2018)** MT (1) FFB Received **175,617.77** RSPO 175,617.77 Non-RSPO 0 (2) FFB Processed **175,617.77** RSPO 175,617.77 Non-RSPO 0 (3) CPO Production **44,785.82** (4) PK Production **8,679.21**
D. 2 D 2.2	**Explanation** The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organiztion (RSPO IT platform or book and claim).	The mill observed met registration and reporting requirements for supply chain through the RSPO supply chain managing organiztion (RSPO IT platform). The registration information were: Name: Rajawali Oil Mill – Sime Darby. Country: Malaysia. Member ID: RSPO_PO1000000305

		Member Category: Oil Mil. Sub License ID: CB46430. Issued on: 25/12/16. Issued by: SIRIM QAS Intl. S/B. Start date: 30/12/16. End date: 29/12/17. Products: CPO & Palm Kernel Program: IP.
D 3 **D 3.1**	**Documented procedures** The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	a) Rajawali POM had revised their documented procedure title '*Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, dated March 2016*. The procedure described the following: • 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 53ispatch 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 53ispatch – [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 / 53ispatch 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

		The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD). b) The Assistant Engineer remained as the person with overall responsibility for and authority over the implementation of the supply chain requirements.
D 3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Clause 7.0 of *SOP for Sustainable Supply Chain and Traceability,* version 2 has described how the Rajawali mill manages the FFB from certified source. It was confirmed that no non-certified FFB was received by Rajawali POM.
D.4 D.4.1	**Purchasing and goods in** The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	Rajawali POM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Semarak Estate, Samudera Estate, Rajawali Estate and Bayu Estate. Monitoring records titled as *"Mass Balancing Records for Oil Mills"* has recorded the tonnage of certified FFB and its supplying estate. Verified through Rajawali POM weighing system called '*SimeWeigh' and random sample of weighbridge ticket from Bayu Estate, Rajawali Estate, Samudera Estate and Semarak Estate.* There was no non-certified FFB received based on the records.
D 4.2	The site shall inform the CB immediately if there is a projected overproduction.	There was no overproduction of certified CSPO during the period under review (Oct 2016 – Sept 2017).
D.5 D.5.1	**Record keeping** The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	Rajawali POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as *"Mass Balancing Records for Oil Mills Year 2016 and Year 2017 ".*
D 6 **D.6.1**	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	Global Trading & Marketing (GTM) Bintulu office informed Sime Darby Austral Sdn.Bhd (SDASB) by e-mail on the dispatch of RSPO certified CPO from the supplying POMs (Rajawali). The dispatch of the RSPO certified CPO to SDASB by the supplying POMs was made based on a specific contract. The receiving pit, pipelines and tanks in SDASB 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 Rajawali POM. For traceability of a specific batch of RSPO certified CPO back to the supplying POM, SDASB 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.
D.6.2	The objective is for 100 % segregated material to be reached.	Rajawali 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 can be considered 100% segregated.

Attachment 6

VERIFICATION OF NON-CONFORMITIES DURING RECERTIFICATION ASSESMENT AT RAJAWALI SOU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.1.2	Minor	**#NCR No : STK 01 2016** 1) The procedure for stacking fronds as per section 7 item 3.1 of SDP Agriculture reference manual (ARM) was not complied with. • Semarak Estate – cut fronds were not stacked and some sighted inside and close to palm circle in field 94SE 2) The practice of re-using all waters from washing of agrochemical containers, PPE and Spraying equipment and spillage during chemical mixing was not re-used. • Semarak and Samudera Estate – water from sump for collecting water from washing of agrochemical containers, PPE and spraying equipment and spillage during chemical mixing was not used and was seen over flowing into drains.	**Corrective Action:** 1) To training the worker, mandore and staff regarding to procedure of stacking frond 2) To keep maintain the water pump and retrain the mandore/chemical mixer.	**Auditor Verification:** During site visit, there was confirmed that all good agriculture practices has been conducted as per SOP such as frond stacking, and practice of re-using all waters from washing of agrochemical containers, PPE and Spraying equipment and spillage during chemical mixing has been practiced to preventing pollution from occurs. #NCR STK 01 2016 Closed.
Indicator 4.1.3	Minor	**#NCR No : JS – 2016 -01** The RSPO internal consultative assessment is used as one of the mechanism to check consistent implementation of RSPO procedures are in place, however for the RSPO internal consultative assessment carried out at the Samudera Estate on the 14th May 2016 the Cause Investigation and Corrective Actions are yet to be initiated.	**Corrective Action:** The report was misplace during the audit – to ensure recording and filing is available and training regarding to record keeping.	**Auditor Verification:** Sighted RSPO Internal Consultative Assessment Report on 8/8/2017 and at Bayu Estate on 14/08/2017 there have 38 finding during assessment, and all root cause and corrective action has been taken by management to initiated, however, certain issues not yet been closed by management regarding approval by top management and ongoing process. #NCR No: JS-2016-01 Closed.

Indicator 4.8.2	Minor	**#NCR No : MZK 01 2016** The process of maintaining Training records found not effective • At Rajawali POM, Semarak and Samudera Estate – Although Social Related Trainings are stated to be carried out, however the records of the training were not available.	**Corrective Action:** Social related with Social and Environmental Project Unit conducted the training on December 2016	**Auditor verification:** During site visit at Rajawali SOU. It was confirmed all the training has been conducted as per planned included social related training such as human right training, gender training, etc. #NCR No : MZK 01 2016 Closed.
Indicator 5.2.3	Minor	**#NCR No : MZK 02 2016** The records of RTE Training was not available during the audit • At Semarak Estate – Although the workers always see the crocodile come out from the river to rest in afternoon, the records of training to regularly educate the workforce about the status of these RTE species was not available.	**Corrective Action:** RTE training with Social and Environmental Project Unit conducted the training on December 2016	Relevant programme to workers pertaining awareness of HCV areas and RTE observed conducted. Among evidence of programme include trainings, such as: • HCV Training for Sarawak Region, 26/8/17. • HCV Awareness for Workers, 2/10/17. #NCR No : MZK 02 2016 Closed.
Indicator 5.2.4	Minor	**#NCR No : MZK 03 2016** The records of Monitoring HCV area was not available during the audit • At Samudera Estate – There was an Action Plan for monitoring the HCV area using Auxiliary Police. However, the records of monitoring result for that area was not available during this audit	**Corrective Action:** To retrain Regarding to HCV area	The CU observed implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. #NCR No : MZK 03 2016 Closed.

Attachment 7

Time bound plan – Sime Darby Plantation Berhad

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, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun 11	17 Jun 21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct 11	4 Oct 21	CU-RSPO-819144, RSPO 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	NA	3 Mar 11	NA	NA	
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	
10	Bukit Puteri	Raub, Pahang	7 Jul 11	6 Jul 21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul 11	6 Jul 21	CU-RSPO-819155, 18502207 001, 824 502 14019	

12	Jabor	Kuantan, Pahang	7 Jul 11	6 Jul 21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec 11	29 Dec 21	CU-RSPO-819163, SGSRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC1700004	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May 10	18 May 20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb 14	17 Feb 19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been comissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul 11	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	RSPO 600305	Pagoh Oil Mill has been commisioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct 10	19 Oct 15	RSPO 550182	
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 11	10 Apr 21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar 11	28 Mar 21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May 10	19 May 15	RSPO 547123	
26	Sandakan Bay	Sandakan, Sabah	1 Oct 08	30 Sep 18	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan 11	20 Jan 21	RSPO 547124	

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	15-Jan-22	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	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	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRA RIA	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 PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	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	Recertification of Rantau Panjang POM is in progress.
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	05-Feb-22	MUTU-RSPO/009	
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	
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	Recertification of Selabak POM is in progress.
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-Sep-16	8-Sep-21	MUTU-RSPO/004	
18 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1 April 2014	30-Nov-21 1 April 2019	MUTU-RSPO/008 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 PERMAI/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	