



PUBLIC SUMMARY REPORT

ANNUAL SURVEILLANCE ASSESSMENT (ASA1)

SIME DARBY PLANTATION Sdn Bhd

Management Unit PTSIA

Sanggau District of West Kalimantan Province, Indonesia

Report Author

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SUMMARY

BSi Group Singapore Pte Ltd (BSi) has conducted the first Annual Surveillance Assessment (ASA1) of Sime Darby Plantation Sdn Bhd Management Unit SOU PT Sime Indo Agro (PTSIA) operations comprising Bukit Ajong Mill, three oil palm Estates, including new development at Sei Mawang, support services and infrastructure. BSi concludes that PTSIA operations comply with the requirements of RSPO Principles & Criteria : November 2007 and the Indonesian Indicators and Guidance (INA NIWG) : 2008.

BSi recommends the continuation of the approval of PTSIA as a producer of RSPO certified sustainable palm oil.

ABBREVIATIONS USED

AMDAL	Environmental Impact Assessment Report
BOD	Biological Oxygen Demand
BPN	Badan Pertanahan Nasional (National Land Agency)
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
ESH	Environment Safety and Health
FFB	Fresh Fruit Bunch
GPS	Global Positioning System
HCV	High Conservation Value
HGB	Hak Guna Bangunan (Land Use Title for factory)
HGU	Hak Guna Usaha (Land Use Title)
HIRAC	Hazard Identification Risk Assessment Control
KUD	Koperasi Unit Desa (Village Cooperative Unit)
LTI	Lost Time Injury
MSDS	Material Safety Data Sheet
OER	Oil Extraction Rate
PK	Palm Kernel
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RKL	Environmental Management Plan
RPL	Environmental Monitoring Plan
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SPKS	Serikat Petani Kepala Sawit (Organisation for Representing Smallholders)
TQEM	Total Quality Environmental Management

1.0 SCOPE OF SURVEILLANCE ASSESSMENT

1.1 Identity of Certification Unit

PTSIA Mill and oil palm Estates are located in Sanggau District of West Kalimantan Province, Indonesia (Figure 1). More detailed information on the estates locations is shown in Figures 2 and 3. The GPS location of the Mill is shown in Table 1.

Table 1: Mill GPS Location

MILL	LONGITUDE	LATITUDE
Bukit Ajong	110° 29'0"E	0° 16' 0" N

1.2 Production Volume

The production tonnages for CPO and PK for the period from the start of the Certificate (18/08/2010) through to the 31 May 2011 and projected for the next twelve months are listed in Table 2, together with those estimated at Initial Certification. It should be noted that the Actual Production is for less than one year.

Table 2: Production Tonnages

Bukit Ajong Palm Oil Mill	Estimate at Initial Certification	Actual 18/08/10 – 17/08/11	Projected 18/08/11 – 17/08/12
CPO	33,609	35,053	41,773
PK	8,914	9,023	9,989

1.3 Certification Details

Sime Darby RSPO Membership No: 035-04(O)
 BSi RSPO Certificate No: SPO 541399
 Initial Certification Assessment: 03 to 06 November 2008
 Date of Certification: 18/08/2010

1.4 Description of Supply Base

Oil palm fruit is sourced from three company owned Estates, Scheme Smallholders and Outside Suppliers. The FFB production from company owned Estates, Scheme Smallholders and Outside Suppliers is listed in Table 3. PT SIA has advised that they expect a substantial increase of crop volume from the company Estates during 2011/12 as significant rehabilitation works have carried out to the under-performing areas. Also, Sei Mawang Estate palms have reached maturity and harvesting of FFB commenced in July 2011.

Table 3: FFB Tonnages Processed

Source	Estimate at Initial Certification	Actual 18/08/10 – 17/08/11	Projected 18/08/11 – 17/08/12
PTSIA Estates			
East	16,314	25,143	33,567
West	38,905	39,098	50,000
Sei Mawang	–	1,148	3,056
Sub-total	55,219	65,389	86,623
Scheme Smallholders			
Himado	98,596	86,499	90,000
Sub-total	98,596	86,499	90,000
Outside Suppliers*			
	10,481	3,422	5,000
Sub-total	10,481	3,422	5,000
OVERALL TOTAL	164,296	155,310	181,623

* The FFB production from the Outside Suppliers is excluded from the RSPO Certificate

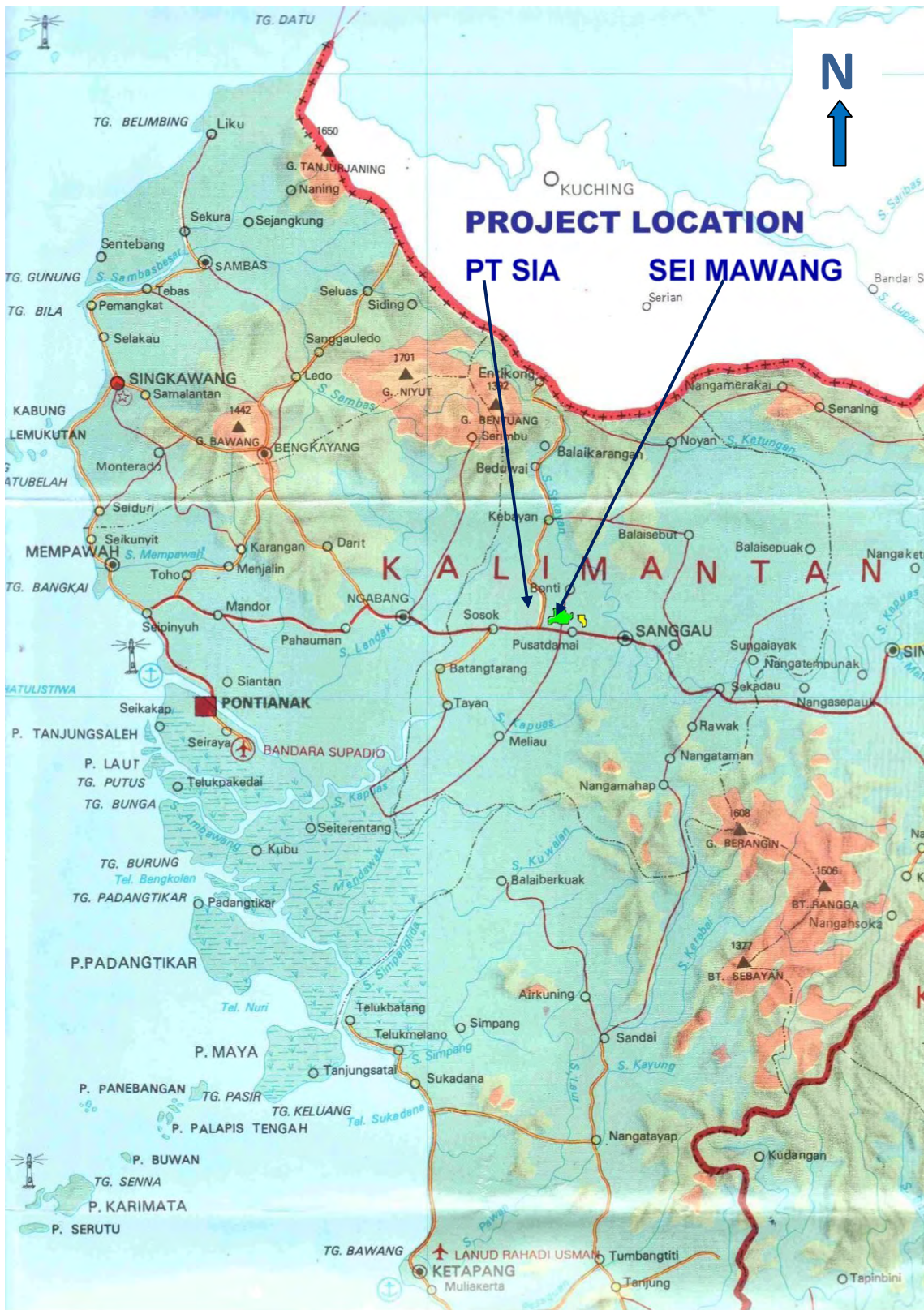


Figure 1: PTSIA Location Map

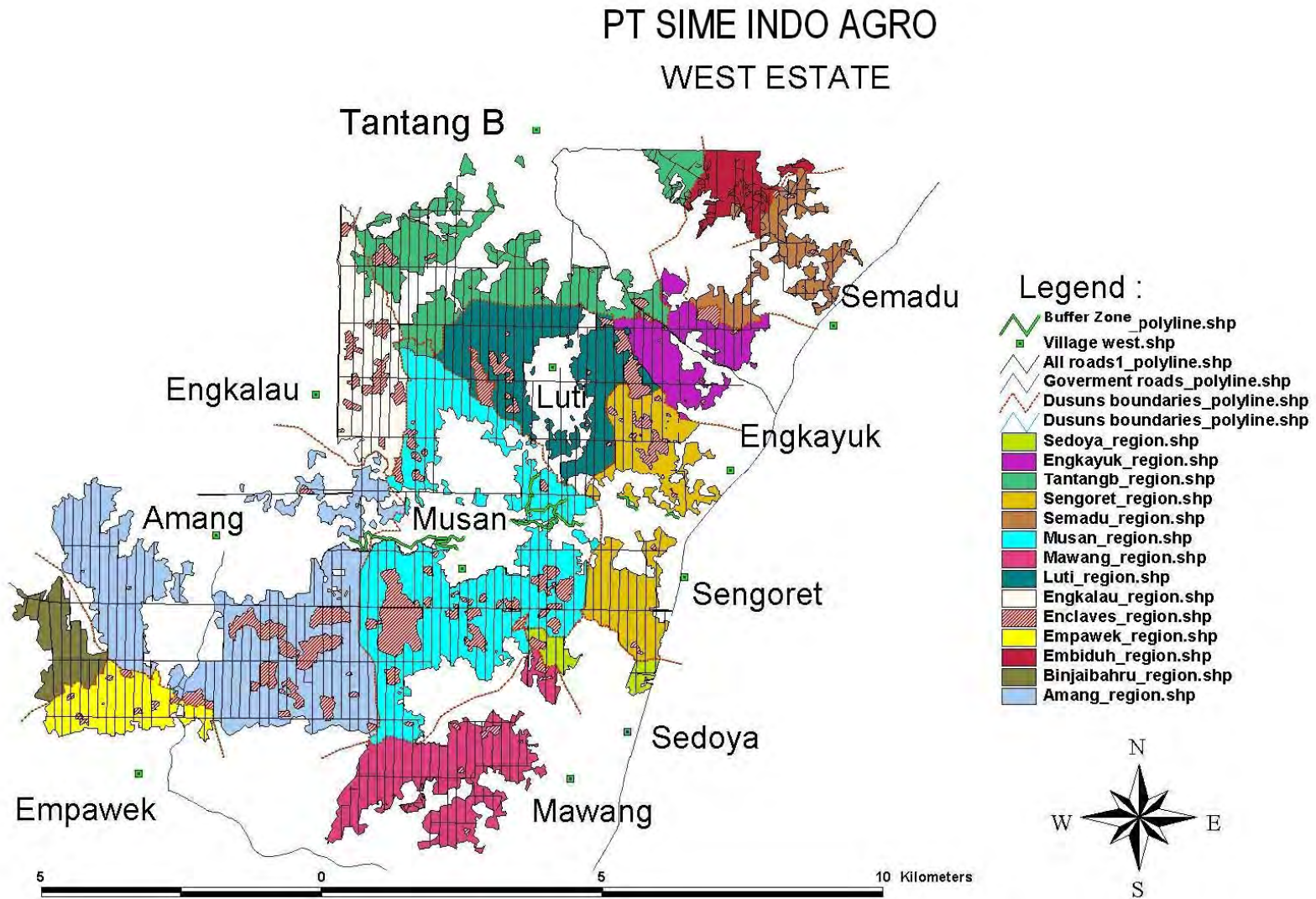


Figure 2: West Estate Layout

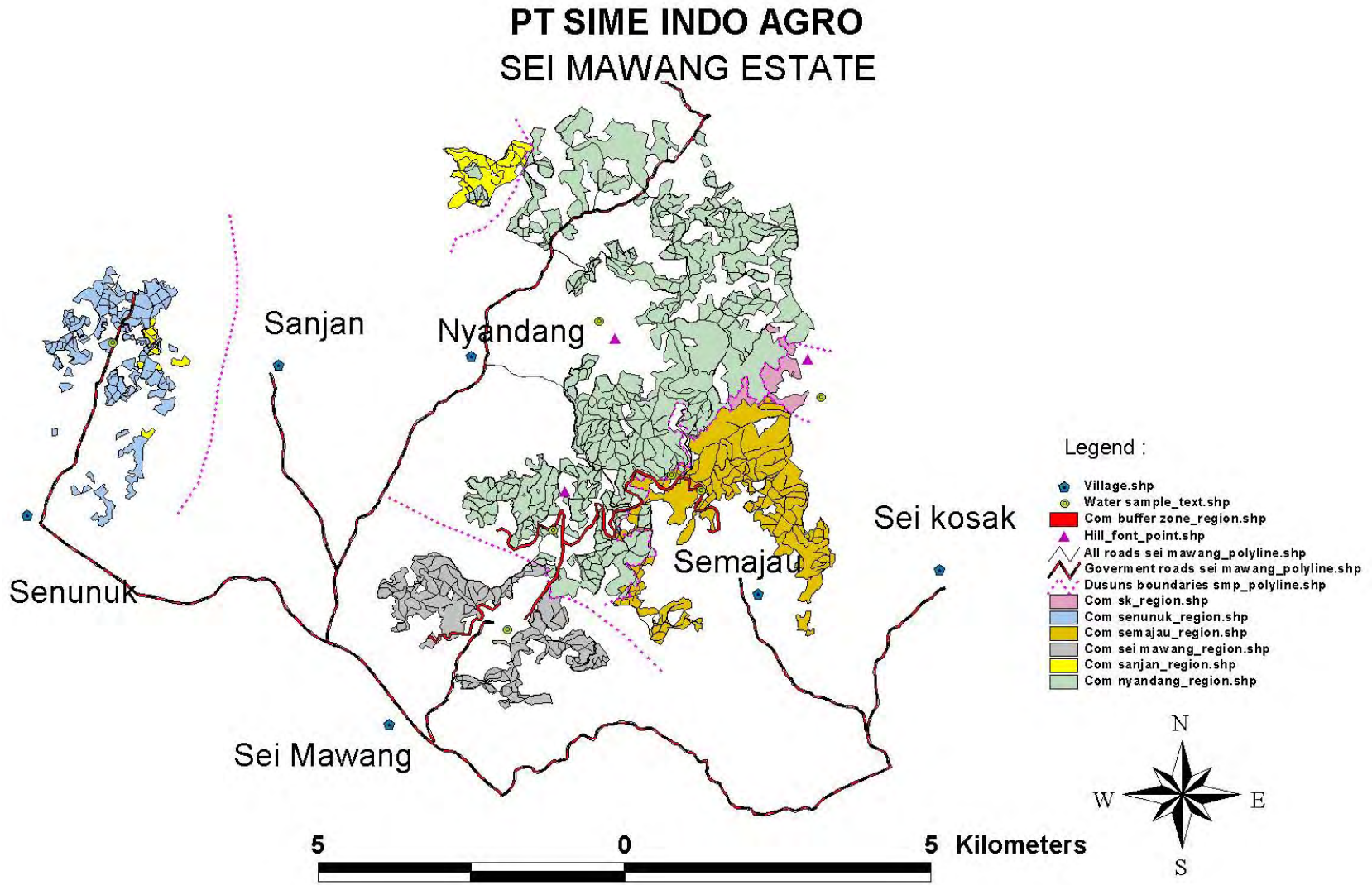


Figure 3: Sei Mawang Estate Layout

Scheme Smallholders supplied 81,160 t (56.3%) and Outside Suppliers 2,985 t (2.1%) of the total FFB processed by the Mill during the approximately 9 month- period of the Initial Certificate. The smallholder scheme was developed as a condition of PTSIA project approval. The scheme comprises one cooperative (KUD) whose smallholder members number 2,132 and have 4,264 ha planted to oil palm.

It was notable that the Scheme Smallholders were achieving relatively good FFB yields with the overall average of 23.1 t/ha during the July 2007 to June 2008 reporting period. In comparison, the overall average FFB yields from East and West Estates were considerably lower (10.6 t/ha) for the corresponding period. The lower estate yields are explained by a significant proportion of young mature palms (4 years old) compared with the smallholder palms (10 years old).

The age profile of the palms at East, West and Sei Mawang Estates is shown in Table 4a. The areas planted are shown in Table 4b.

Table 4a: Age Profile of PTSIA Palms

Age (years)	Estate and % of Planted Area		
	East	West	Sei Mawang
11–20	60	100	0
4–10	40	0	92
0–3	0	0	8

Table 4b: PTSIA Estates and Areas Planted

Estate	Mature (ha)	Immature (ha)
East	2,549	0
West	2,768	0
Sei Mawang	1,694	143
TOTAL	7,011	143

1.5 Progress against Time Bound Plan

Sime Darby Time Bound Plan (updated June 2011) is included as Appendix A. During 2010, Sime Darby initiated the realignment of three of the Management Units in Malaysia for strategic operating reasons. To date, the realignment of three Management Units (SOU9a, SOU30a and SOU30b) have been completed, reducing the total number of Management Units from 61 to 58.

Sime Darby has completed Initial Certification Assessments for all of the Management Units in Malaysia, and 11 of the 21 in Indonesia. Sime Darby has scheduled the Initial Certification Assessments for the remaining 10 Management Units in Indonesia for mid-2011 and is on track to achieve the targets of the Time Bound Plan.

Sime Darby provided BSi with an update on progress with resolution of issues raised in 2008 at PT MAS in Indonesia. A follow-up meeting was held between top management of Sime Darby Plantation and representatives of Serikat Petani Kepala Sawit (SPKS) (Organisation for Representing Smallholders) during the RT8 Conference in Jakarta. Mr Paul Wolvekamp of Both ENDS mediated the meeting that was also attended by representatives of Sawit Watch and House

of "Adat" from Sanggau. Inquiries by BSi indicated that significant progress has been made with regard to the issues raised earlier. No new issue was highlighted during the meeting.

BSi's continued involvement with 13 of the Sime Darby Management Units during the previous 12 months has not identified:

- (1) any unresolved significant land disputes;
- (2) any replacement of primary forest or loss of HCVs (Sime Darby did not carry out any new land development during 2010/11);
- (3) any labour disputes that are not being resolved through an agreed process;
- (4) any evidence of noncompliance with any law at any of the landholdings.

BSi considers that Sime Darby meets the RSPO requirements for Partial Certification.

1.6 Progress of Associated Smallholders/ Outgrowers towards RSPO Compliance

The Lead Assessor visited the cooperative during ASA1 and interviewed the Manager and staff to evaluate their progress with implementing the RSPO P&C. The BSi Assessors also inspected a sample of Smallholder blocks and interviewed Smallholders. The BSi assessors found that PTSIA has assigned a full time extension officer for training and awareness of Smallholders on RSPO. This had resulted in the KUD's increased understanding of RSPO requirements.

PTSIA employs staff whose role is to provide extension services and support to the smallholders. PTSIA has developed an RSPO implementation plan to achieve certification of its Scheme Smallholders within three years of the initial certification. Interview of a sample of smallholders confirmed that PTSIA had continued to provide support. The scheme smallholders' general understanding of the RSPO requirements had improved and BSi recommends the continuation of inclusion of their production in the Certificate.

1.7 Organisational Information / Contact Person

PT Sime Indo Agro
Bukit Ajong
Dusun Kopar
Desa Dosan Kec Parindu Kab
Sanggau West Kalimantan
INDONESIA

Contact Person: Mr Mohd Amri B. Baharudin
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2.0 ASSESSMENT PROCESS

2.1 Assessment Team Members

Charlie Ross – Lead Assessor

Iman Nawireja – Social/Environment Assessor

Robyn Ross – Social Assessor (Women and Families)

Ismi Edris – Facilitator (Women and Families)

A CV for Ms Edris, a new team member, is included at Appendix B.

2.2 Assessment Programme

The ASA1 was carried out 30 May to 01 June 2011. The Assessment Programme is included as Appendix C.

The Programme included assessments of the Mill and two Estates (West and Sei Mawang) against all of the applicable RSPO indicators.

The nonconformities assigned to Five (5) Major Compliance Indicators and Six (6) Minor Compliance Indicators and the seventeen (17) observations that were identified during the Initial Certification Assessment were followed up to check the effectiveness of corrective actions (Refer Section 3.3 Page 16).

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Checklists and questionnaires were used to guide the collection of information. The ASA1 findings are detailed in Section 3.2 Page 14.

This report is structured to provide a summary for each Principle, together with details for selected indicators. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

Mr Soon Leong Chia, BSi Product Manager RSPO, has reviewed this report for conformance with BSi Procedures and the RSPO Certification System requirements.

2.3 Stakeholder Consultation

Internal and external stakeholders were consulted to obtain their views on PTSIA environmental and social performance and any issues of concern that they may have. External stakeholders were interviewed at their premises where practical or they were invited to the Mill or the Estate. Internal stakeholders were interviewed in groups in the workplace or at their housing. Company officers were not present at any of the meetings.

A list of Stakeholders contacted/interviewed is included as Appendix D.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

During this First Annual Surveillance Assessment, Nonconformities were assigned against Major Compliance Indicators 2.1.1, 4.1.1, 5.1.2 and Minor Compliance Indicators 5.3.2, 6.1.2 and 6.1.5. Ten (10) Observations/Opportunities for improvement were identified. PTSIA prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSi reviewed and accepted.

PTSIA carried out corrective actions to address the Nonconformities assigned to the Major Compliance Indicators, which BSi Assessors considered appropriate and effective. The Nonconformities were closed – refer Section 3.2 Page 14.

Review of the nonconformities assigned during the Initial Certification Assessment found the corrective actions were being effectively and consistently implemented and the nonconformities remained closed. In addition, sixteen (16) of the seventeen (17) observations had been actioned and the improvements were considered to be effective for addressing the issues (Refer Section 3.3 Page 16). The observation assigned to Minor Compliance Indicator 6.1.5 had not been actioned and therefore was upgraded to a nonconformity (CR16) – refer Section 3.2 Page 15 for details.

BSi recommends continuation of Certification for PTSIA as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

The Mill and Estates have maintained the system for receiving and responding to written requests for information. Records showed that requests were processed in a timely manner. PTSIA has maintained the important documents that the RSPO requires to be reviewed periodically and these are detailed in the relevant sections of this report.

Criterion 1.1: Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.

The Estates and Mill have maintained the filing system for responding to written requests for information, together with the company's reply. For example, a letter from Sanggau District Secretariat was received on 04 April 2011 inviting PTSIA to attend the monthly meeting to set the FFB price. Records indicated that requests were responded to promptly.

Criterion 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.

PTSIA holds copies of each of the management documents that are required by RSPO and these have been kept up to date. The management documents are available on request

and details are available in this report for the relevant Principle.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

PTSIA has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations. Inspection of records confirmed that the Mill and the Estates visited have maintained legal compliance with statutory requirements relating to factories and machinery, health and safety, labour and the environment. The boundaries of the Estates are defined by boundary stones and block markers have been maintained so that they are clearly visible. Interview of local community representatives did not identify any land tenure issues.

Criterion 2.1 – There is compliance with all applicable local, national and ratified international laws and regulations.

Sucofindo tested the Mill boiler emissions and ambient air quality on 23 December 2010 (Analysis No P2621-10) and the results confirmed compliance with emission limits. The Mill monitors the effluent treatment system daily and forwards samples to the independent Sucofindo Laboratory monthly for testing. Review of the previous 12 months data (Figure 4) showed the maximum BOD was 764 mg/L in July and August 2010, which is well within the license limit for land application of treated POME (5,000 mg/L, issued by Bupati Sanggau, 17 January 2011).

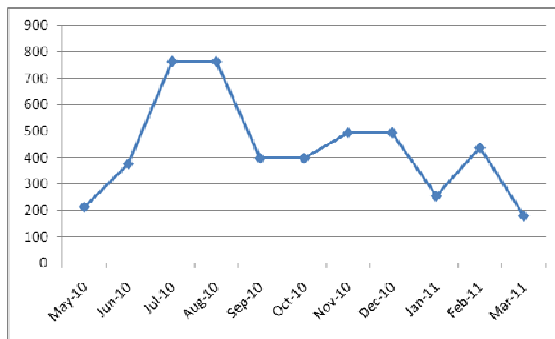


Figure 4: BOD of Treated Mill Effluent May 2010 – March 2011

PTSIA holds copies of relevant licences for operation of plant and equipment such as the mill boiler (License No 17/ED.051A, current to December 2012) and compressors. The equipment licences were displayed at the mill office. Inspection of a sample of licences confirmed that these were current at the time of the Certification Assessment. A copy of the operators' certificates, such as the fireman (P.198/PNK3-PUBT/B-1/09), and drivers' licences were kept on personnel files.

Inspection confirmed the housing meets the minimum standard. The new housing at the Mill and the Estates has rainwater tanks installed for drinking water. Water for potable use at West estate is supplied from a groundwater bore. Water quality had recently been sampled but at the time of the ASA1 visit, the most recent laboratory test results were not available.

PTSIA has kept up to date a legal register that includes a list of all licences and expiry dates, a list of applicable laws and a summary of compliance requirements for the licences and legislation. Inspection of a sample showed the information was kept up to date.

(CR12 – refer Section 3.2 Page 14 – A Nonconformity was assigned to Major Compliance Indicator 2.1.1 because inspection of a sample of pay records showed a number of instances where workers regularly exceeded the approved overtime limit.)

Criterion 2.2 – The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.

PTSIA has not acquired any additional land and as advised in the Certification Assessment, the company holds HGU for the Estates and a HGB for the Mill.

Field inspection of a sample of BPN boundary stones found that PTSIA has maintained a marker peg painted red and white next to the concrete BPN boundary stones to make them clearly visible.

PTSIA has continued to engage in dialogue with SPKS following the first meeting of the parties held on 13 January 2009 at Sanggau. However one of the issues has been the lack of SPKS representatives to attend meetings. PT MAS has appointed a consultant to develop a social management plan for conflict resolution between SPKS and PT MAS, and at the time of ASA1, the consultant "Links" had completed its field work. A Final Report and recommendation is expected to be finalised next month, where company will use it as guidance to settle the dispute between PT MAS and SPKS.

Criterion 2.3 – Use of the land for oil palm does not diminish the legal rights or customary rights of other users without their free, prior and informed consent.

PTSIA has not acquired an additional land since the Initial Certification and there has been no change to the information reported in the Initial Certification Public Summary Report.

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

The Mill and Estates report monthly to head office on the production performance in relation to targets. The Mill OER has been variable over the past 5 years, but has recovered to 22.37%. However, this has been offset by a decline in FFB Yield over the same period, that was indicated to be related to transfer of land to smallholders and uncertainty over the accuracy of the land survey.

Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.

The Mill OER over the past 5 years decreased from a high of 22.37% in 2007 to 21.7 in 2008. The OER has increased back to 22.37% in 2010 due to improved FFB quality (Figure 5).

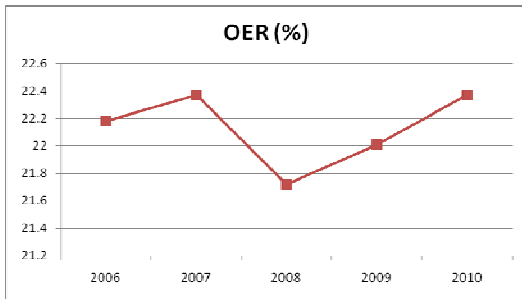


Figure 5: Average Annual OER 2006 – 2010

West Estate FFB yield decline (Figure 6) was stated to be related to the hand-over of land to plasma farmers, who selected the best land. In addition, there is some uncertainty over the hectareage of the company land, which is currently being re-surveyed and this is likely to affect yield per hectare. The plasma blocks are scattered among the company estates and there may be issues of crop security. PT Minamas has a Research Department that communicates information regularly to the Estates and Mills on new and improved practices.

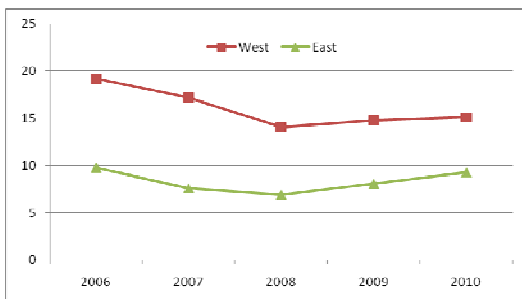


Figure 6: Average Annual FFB Yield (t/ha/yr) 2006 – 2010

Replanting is not due until 2022 and a Replanting Programme has not been prepared as it is not applicable at this time.

PRINCIPLE 4: Use of Appropriate Best Practices by Growers and Millers

PTSIA has implemented the best practices developed by Sime Darby for managing and improving the oil palm production and yield. Although PTSIA is managed through PT Minamas, the Sime Darby field practices have been maintained. The Estates have protected the riparian buffer zones from disturbance and these remain clearly demarcated. Inspection confirmed there was good improvement in groundcover vegetation within the estates, which is very important for prevention of soil erosion. The Mill achieved almost 20% reduction in the average annual water usage between 2007 and 2010. The Estates continued to expand the establishment of beneficial plants along roadsides, and to date there has not been an outbreak of leaf-eating palm pests. The management has continued to focus on safety awareness of staff and workers and the Estates' accident rate has been reducing since 2007, while the Mill had one lost time injury in April 2011.

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

PTSIA came under PT Minamas management in August 2010 and has adopted the PT Minamas Agriculture SOPs Issued 01 December 2009. The SOPs are in Bahasa Indonesia and cover all Estate operations. The SOPs are based upon the Best Practices from each of the companies.

The Plantation Advisor visits the Estates twice yearly and inspects all operations. The most recent visit was 22-24 March 2011 and the Estate Manager has responded to issues raised by the Plantation Advisor with a description of action taken to improve implementation of field practices.

Mill Operators carry out hourly checks on the operations during each shift and record operating parameters on shift log sheets. The Shift Supervisors report on any abnormal operating conditions and notify the workshop of the need for any repairs or maintenance. The Mill Engineer and Mill Manager carry out daily checks of the shift log sheets as well as condition monitoring. The PT Minamas Mill Advisor carries out approximately six-monthly inspections, with the most recent report 10-11 January 2011. The Mill Manager has responded to the Mill Advisor's findings with corrective actions and target dates for implementation.

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

The PT Minamas Agronomist carries out annual inspections of palms and leaf sampling for tissue analysis on a per block basis at the company's Estates. The Estate holds copies of the Agronomist leaf tissue analysis reports, with the most recent visit 28 March 2011 with fertiliser recommendations made for the 2011-12 year. The Minamas Research Centre carried out soil sampling during a soil survey of the Estates in 2007.

Treated POME is applied to 75 ha of land using a flat bed system. The Mill maintains daily records of the volume of treated effluent disposed by land application and the tonnage of EFB recycled to the palms at the Estates and to plasma.

Criterion 4.3: Practices minimise and control erosion and degradation of soils.

Field inspection showed the groundcover vegetation was consistently good throughout the Estates, including on terraces at undulating and hilly areas. The improvement since Initial Certification is due to the changed spray program and training of sprayers in the correct technique for herbicide application.

The Estates have an annual road maintenance programme that includes a monthly schedule for grading, compacting and resurfacing with gravel. In addition, a gang carries out manual patching of potholes on an "as required" basis. Inspection indicated the roads were adequately maintained and greater emphasis has been placed on improving drainage. The Estates have a programme of roadside pruning to increase the penetration of sunlight on roads.

Criterion 4.4: Practices maintain the quality and availability of surface and groundwater

Inspection of Sg Sengaret found the riparian buffer zone was being consistently maintained and the areas visited were set aside to the correct width. The vegetation at buffer zones was mainly secondary regrowth with some mature trees remaining.

PTSIA is taking the opportunity to install rainwater tanks at new housing that is under construction. The Water Management Plan includes collection of rainwater at existing buildings, for example at West Estate, rainwater is collected from the Store Building and the Office and used for general purposes and for cleaning.

An incident occurred at 6.30 pm on 25 February 2011 when one of the embankments of the Mill final effluent pond failed and treated effluent was discharged and flowed into Sg Sengoret. The effluent pond operator reported the incident immediately to the Mill Manager, who took action to stop the discharge. PTSIA then mobilised the portable fire fighting pumps and reclaimed as much effluent as possible from Sg Sengoret and transferred it to the land application system. The Mill Laboratory Supervisor collected samples of the effluent at the discharge and from Sg Sengoret for analysis, and the results showed BOD of less than 100 mg/L. PTSIA informed the Kg Sg Sengoret people immediately of the situation and supplied the village with tankers of clean water for domestic use until the river water quality returned to the previous condition.

Inspection of the Mill effluent treatment ponds found that repairs to strengthen and increase the height of the walls had been carried out. However, there were several “low spots” where there was insufficient freeboard and there is a high risk of “overtopping” and discharge of partially treated effluent from Pond No. 4 and the Cooling Pond. Upgrading and strengthening the Pond containment walls was in progress but at the time of the site visit had not yet been completed due to the time required to allow settlement and compaction of the earthen wall. **(CR13 – refer Section 3.2 Page 14 – A Nonconformity was assigned against Major compliance Indicator 4.4.1 because of the high risk of overtopping the pond wall.)**

Interview of the Adat Leader revealed that an effluent pond discharge had occurred previously. The Adat imposed a fine on the company who then had to pay compensation to each of the affected villages. If such an incident occurs again, the Adat will apply a heavier penalty.

The Mill continued to use an hour meter linked to the raw water pump operation to calculate water usage. The Mill has ordered a flow meter for installation and to provide more accurate measurement of water usage. Water usage over the past 5 years has decreased from a high of 1.36 t/t FFB in 2007 to 1.13 t/t FFB in 2009 and 2010 (Figure 7).

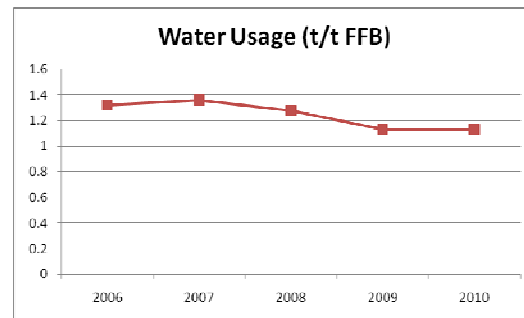


Figure 7: Annual Mill Water Usage 2006-2010

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate integrated Pest Management (IPM) techniques.

The IPM programme is centred around the establishment of beneficial plants along roadsides. The Estates have established a nursery for propagation of beneficial plants. *Cassia cobanensis* has been found to be the most successful in terms of ease of establishment, growth and maintenance. The main palm pest is rats and West Estate has installed 40 barn owl boxes to attract barn owls. Rat bait has not been applied for two years. West Estate has established *Turnera subulata* along 3.5 km of roads and *Cassia cobanensis* along 5.3 km of roads. PTSIA has not had an outbreak of leaf-eating palm pests.

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives and this is documented.

The Estates have continued to use only 4 herbicides, all of which are registered and approved by the Department of Agriculture.

The Estates record pesticide usage on a daily “Stores Issue Chit” and the information is transferred to the “Bin Card” for each chemical and includes the field where the treatment was carried out and quantity applied. The Bin Card data are entered to computer for preparation of a monthly Stores Summary. The Senior Assistant determines the daily spray work program with reference to the Annual Weeding Programme and inspection of field conditions. Inspection of the West Estate Pesticide Store confirmed that it meets the requirements in relation to safe storage, such as security, ventilation, spill containment, labeling of chemicals and availability of appropriate PPE. Interview of sprayers indicated they were aware of appropriate safety precautions and the product label instructions.

Used pesticide containers are triple rinsed, marked with red paint to indicate previously used for storage of chemicals and are kept in a secure store. Inspection confirmed the used containers had been rinsed and appropriately marked. Used chemical containers that were excess to requirements were stored securely in a hazardous waste store. PTSIA is

attempting to arrange the returning of used pesticide containers to the registered chemical supplier. **Observation 01 – refer Section 3.2 Page 15 – At West Estate used 20 L containers for transporting pre-mixed herbicide to the field were inadequately marked to warn of the contents.**

PTSIA has not used any World Health Organisation Type 1A or Type 1B chemicals for control of palm pests. Inspection of the Chemical Store at East Estate and examination of Bin Cards confirmed nil stock of World Health Organisation Type 1A and Type 1B Chemicals. Inspection of the monthly printouts of the Chemical Store Stock Records showed that PTSIA previously used paraquat but usage ceased before the merger of the companies in November 2007.

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.

PT MINAMAS Chief Operating Officer has approved a Safety and Health Policy dated 01 April 2010. The Policy displayed prominently at the Office and at the Muster areas on Notice Boards. Health and Safety information is communicated to staff and workers at morning muster briefings and training. Field inspection and observation of harvesting and upkeep tasks, such as fertiliser application and spraying, indicated that safe work practices were implemented. **Observation 02 – refer Section 3.2 Page 15 – Inspection of the Mill and Sei Mawang Estate indicated that PPE hearing protection was not being worn consistently by persons working in ‘high noise’ areas.**

The Assistant Manager at West Estate is being trained to achieve the National Safety Certificate (AK3) and is the responsible person for coordinating health and safety. The Estate and the Mill have continued to hold quarterly safety committee meetings, with the most recent meeting held 07 February 2011 and 09 May 2011.

The Mill team reviewed the HIRAC on 6 April 2011, and the Estates team reviewed the HIRAC on 10 May 2011. There had been no change to the Mill process or equipment and therefore there was no significant change to the HIRAC risk rankings.

The Mill and Estates have a Safety Training Schedule and briefings are made daily at the Estate muster and at the Mill during Monday morning briefings. Records are maintained of specific safety training for individual tasks, including topic, trainer and trainees. Safety training for pesticide operators was carried out in May following morning muster. The Mill has updated the ESH Training Programme for 2010-11 and safety training is included as part of the SOP training for each work station. Records are held of training, for example Boiler Station training was carried out on 09 November 2010 for 7 Operators and Supervisors.

The Mill has kept the Emergency Response Plan up-to-date, for example, in April 2011 a Safety Briefing Booklet was prepared for all visitors and new hires, which includes the latest information such as emergency contact phone numbers. Trial emergency evacuations have been carried out, with the most recent 27 April 2011 for a fire drill at the Mill that preceded fire fighting training. First Aid training was carried out on 25 May 2011 by a medical doctor for 23 supervisors from the Mill and the Estates.

The last Estate accident was recorded on 15 April 2010. The Mill and Estate accident statistics (Figure 8) are reported monthly to Head Office who reviews and advises on further action that may be required. The most recent Mill LTIs was April 2011.

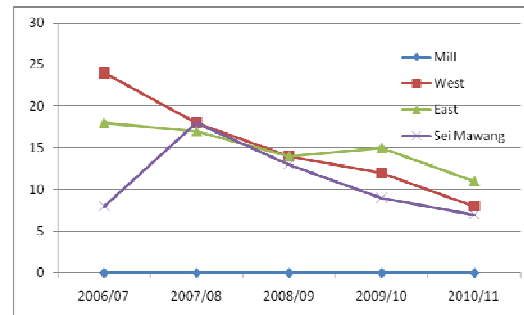


Figure 8: LTI Index for Mill and Estates 2006 – 2011

Criterion 4.8: All staff, workers, smallholders and contractors are appropriately trained.

The Estate and Mill have maintained training records, including training for smallholders, for example on the “application of EFB” AT Farmer Groups 5 and 7 on 26 May 2011. Records are held of the training topic, names of attendees with signatures and trainer.

The Mill has maintained the “Permit to Work” system for hazardous tasks, such as confined spaces, hot work, electrical repairs and work at height. The mill provides safety induction training for contractors and holds a “Pre-job Safety Meeting” then examines worker capabilities and knowledge before issuing a Permit to Work.

PRINCIPLE 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

Although the HCV within PTSIA landholdings is limited to riparian vegetation along the small streams that drain the estates, the company has continued with awareness programmes to educate workers and smallholders on the need to protect flora and fauna.

The Mill and Estates complied with regulations relating to the segregation, storage and disposal of scheduled wastes. Further improvement is needed in relation to separation of “green” gardening waste from housing and the mill that could be used as compost.

Renewable energy usage at the Mill has increased since 2008 (Figure 9), while that from fossil fuels has remained static.

PTSIA maintained compliance with its zero burning policy and continued to focus on pollution reduction through soil conservation to minimise soil erosion and sediment discharge in rainfall runoff.

Criterion 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 continuous improvement.

PTSIA has not made any changes to the scope of the operations, however the Environmental Aspects and Impacts Register has been reviewed, using a risk assessment process to identify the significant impacts of the Mill and Estates. **Observation 03 – refer Section 3.2 Page 15 – The Environmental Aspects Register had not been updated to include, for example, the residual risk associated with the improvement to the effluent ponds, following the recent accident involving discharge of effluent.**

Observation 04 – refer Section 3.2 Page 15 – PTSIA needs to consult with the Ministry of Environment to clarify the status of the Sei Mawang AMDAL, which was approved after the Sei Mawang oil palm development had been completed.

PTSIA has two AMDALs, one for Bukit Ajong Mill and East and West Estates and one for Sei Mawang Estate, therefore two separate RKL/RPL Monitoring Reports need to be prepared. **CR14 – refer Section 3.2 Page 14 – A Nonconformity was assigned because at the time of the visit, an RKL/RPL Report had not been prepared for Sei Mawang Estate.**

PTSIA has prepared six monthly environmental monitoring RPL reports to Government in accordance with relevant regulations. The most recent RPL report was 09 February 2011 for the July-December 2010 period.

Criterion 5.2: The status of rare, threatened or endangered species and 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 their conservation taken into account in management plans and operations.

Aksenta carried out a follow-up HCV and SIA assessment in March 2010, but at the time of the ASA1 visit, only a Draft Report was available.

PTSIA has installed signboards and conducted an awareness program to communicate information to workers and local communities on the need to protect fauna, riparian buffer zones and remnant patches of forest. **Observation 05 – refer Section 3.2 Page 15 – At Sei Mawang *Mucuna bracteata* has encroached the buffer zone and needs to be eradicated from the riparian vegetation.**

Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.

Inspection of the Mill showed that palm by-products were well managed, in particular the EFB stockpile was kept to a minimum by regular back-loading of trucks following deliver of fruit to the mill.

The Mill and Estate have established Registers for stock-take of B3 hazardous wastes. The Estates transfer scheduled wastes to the Mill which holds a B3 License issued by Bupati Sanggau. Used pesticide containers will be returned to the Supplier.

CR15 – refer Section 3.2 Pages 14/15 – A Nonconformity was assigned because waste management could be improved.

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximised.

The Mill maintains records of the quantities of fibre and nut shell used as fuel in the boiler and the quantity of electricity generated by the steam turbine. The Mill has optimised the use of the steam turbine to generate electricity and the diesel genset is used only for standby power. The renewable energy usage initially declined between 2006 and 2008, but has increased since that time to maximise the use of the steam turbine for generation of electricity (Figure 9).

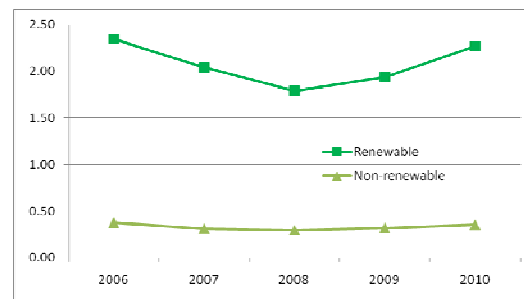


Figure 9: Renewable and Non-renewable Energy Usage (kWh/t CPO) 2006 – 2010

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situation, as identified in the ASEAN guidelines or other regional best practice.

There has been no new development carried out at East and West Estates since 2005. Inspections during the ASA1 visit did not find any evidence of the use of fire for waste disposal at any of the Estates, indicating consistent implementation of the zero burning policy. **Observation 06 – refer Section 3.2 Page 15 – An instance of fire being used for disposal of ‘garden waste’ was observed at West and Sei Mawang Estates housing.**

The Estates have maintained their capacity to make an emergency response to land burning such as the trained fire team and mobile equipment for fighting fires. Site inspections confirmed the fire-fighting equipment was located at the Mill and Estate workplaces, stores, workshops, offices and housing and was in serviceable condition. There was no incident involving fire for more than one year due to the regular rainfall that has maintained moist condition.

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

PTSIA has focused on ensuring point sources of pollution are well controlled and has now turned its attention to addressing the broader landscape level effects. These include ensuring there is adequate groundcover of vegetation within the oil palm blocks to protect the soil from

erosion by rainfall runoff. Additional considerations are the use of IPM techniques to reduce pesticide usage.

PTSIA makes EFB freely available to smallholders, who transport the material by back-loading from the Mill. This has eliminated the problem of accumulation of a very large stockpile of EFB that was present during the Initial Certification Assessment visit.

PRINCIPLE 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers

PTSIA has maintained communication with local communities by means of the monthly meetings with the Smallholder Cooperative and with the Adat Council, as required. Interviews of stakeholders found that no new issue or dispute has emerged. Internal stakeholders confirmed there was no discrimination and the company recognised their right to freedom of association. Workers' terms and conditions were consistent with the latest Collective Labour Agreement.

Contractors stated they did not have any issues relating to contract conditions and that payments were made in a timely manner. PTSIA responded positively to local community requests for assistance that were considered appropriate.

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts 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 continuous improvement.

PTSIA uses the monthly meetings with the Smallholder Cooperative for monitoring community issues. In addition, local communities communicate issues directly to PTSIA staff and management whenever a situation arises. Social issues that arise are discussed by PTSIA and KUD representatives at these monthly meetings.

There has been no change to the scope or size of PTSIA operations comprising Bukit Ajong Mill, East and West Estates and Smallholder Scheme. There was no further land development at the Sei Mawang Estate and planting all of the available land has been completed. "Scout" harvesting of FFB has commenced at Sei Mawang Estate.

PTSIA has prepared and submitted six monthly environmental management and monitoring reports to Government and the Mining and Environment Impact Management Agency of Sanggau Sub-district, and the most recent report was August 2011.

The Observation (OBS13) assigned during the Initial Certification Assessment was upgraded to a Nonconformity (CR16) against Minor Compliance Indicator 6.1.5 because the impact of the smallholder scheme had not yet been included in the RKL/RPL Report – refer Section 3.2 Page 15 for details.

Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or

millers, local communities and other affected or interested parties.

PTSIA has maintained communication and dialogue with local communities through the monthly KUD Meetings. Interview of the KUD manager and local community representatives confirmed there was a good relationship with the company and they were able to raise issues directly with the mill and estate managers.

Observation 07 – refer Section 3.2 Page 15 – The Mill and Sei Mawang Estate list of stakeholders was incomplete because it did not include contact details and it had not been updated since the Initial Certification Assessment. West Estate List of Stakeholders was undated to show it was current.

Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

PTSIA has continued to involve the local Adat Council in the dispute resolution process. A recent example was in relation to the incident involving discharge of treated mill effluent into Sg Sengoret.

Criterion 6.4: Any negotiations concerning compensation for loss of legal or customary 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.

PTSIA did not acquire any additional land during the past year and there was no negotiation concerning compensation for loss of land.

Criterion 6.5: Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

PTSIA provides information on pay and conditions to staff in letters of appointment. The pay rates of "daily rated" workers and "piece rated" workers are displayed on notice boards at the Estates and the Mill. Interview of Staff and Workers indicated that they are able to make small savings but working overtime provides additional income. Working conditions are detailed in the Collective Labour Agreement that is available for all permanent workers.

Inspection showed PTSIA housing meets the minimum standard and residents are provided with free electricity, water (each house has a tank for storage of rainwater), medical treatment, places of worship and recreation areas. Residents are allowed to maintain small vegetable gardens near houses, with produce also available for purchase from local traditional markets. Primary School is located at Layau and Secondary Schools at Bodok and Sanggau. The company provides transport to both at no cost to families. The company provides worker families with 15kg of rice each month. Workers and their families requiring medical treatment attend a clinic in nearby Bodok and PTSIA reimburses the costs. **Observation 08 – refer Section 3.2 Page 15 – Presently there is no Clinic, Crèche or Kindergarten on site. However, an arrangement is in place with Puskesmas, located in Bodok, to provide medical services.**

Observation 09 – refer Section 3.2 Page 15 – Presently there is no formal system for residents to register requests for repairs to housing as some “verbal” requests are not being actioned.

Observation 10 – refer Section 3.2 Page 15 – Presently the agreements with contractors do not specify the requirement to comply with Labour Laws.

Criterion 6.6: The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

Interviews of workers found they are free to join a union and most are members of SPSI. However the union was inactive and had not met with PTSIA management during the past year.

Criterion 6.7: Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision, and when not interfering with education programmes. Children are not exposed to hazardous working conditions.

New hires are required to provide their identity card for proof of age. Inspection of personnel records confirmed that age checks have been made at time of hire and a copy was held of identity cards. Underage workers were not observed at any of the Mill or Estate locations inspected.

Criterion 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.

PTSIA has a statement on the prevention of any form of discrimination in the Social Policy signed by top management, which is displayed at muster areas and offices. Interview of staff and workers indicated there were no issues related to discrimination and that they received equal treatment in relation to working opportunities. Inspection of a sample of pay records did not find any disparity in relation to persons employed on the same position classification level.

Criterion 6.9: A Policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

The PTSIA Social Policy includes a statement on the prevention of sexual harassment and violence. In addition, the policy is supported by disciplinary procedures that are documented in the Collective Labour Agreement.

Interview of staff and workers confirmed awareness of the PTSIA Sexual Harassment Policy. Female staff and workers stated they understood the policy and what action should be taken if there was a situation involving sexual harassment or violence. Interview of female staff and workers confirmed a Gender Committee has been formed to facilitate the processing of any grievances raised but the process has not been used as no issues raised.

Criterion 6.10: Growers and mill deal fairly and transparently with smallholders and other local businesses.

Interview of contractors found that they are treated fairly by the company and that they had the opportunity to bid for other PT Minamas work that was managed from head office. The bidding process was understood and they stated that payments were made on time.

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

PTSIA is in a relatively remote rural location and access to government services is limited. PTSIA responds to local community requests for assistance where possible. The majority of requests are in relation to assistance with road works, for example a request was received on 11 October 2010 from Desa Suka Mulya to repair approximately 1.5 km of the access road. PTSIA responded and repaired the road within 1 week of receiving the request.

PRINCIPLE 7: Responsible Development of new Plantings

PTSIA has not carried out any new development of land to oil palm since the Initial Certification Assessment. Principle 7 therefore is not applicable to this Annual Surveillance assessment.

PRINCIPLE 8: Commitment to Continuous Improvement in Key Areas of Activity

PTSIA has continued to make improvements on environmental and social issues. The estate FFB yields and mill OER have increased which is a good indicator for more sustainable production. This has been achieved by improving the recycling of palm by-products to the field and greater attention to work practices and quality control.

The Estates have improved groundcover vegetation and water management of roads through regular maintenance, which are important for control of soil erosion. The relationship with external stakeholders has improved and engagement with the Adat Council has been important for resolving local issues.

Criterion 8.1: Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

PTSIA has not used any World Health Organisation Class1 pesticides and ceased using paraquat in November 2007. Data show a reduction in pesticide usage, in particular glyphosate, since 2007.

The Estates environmental improvement program continues to focus on improvement of FFB yields through recycling of EFB to the field and reduction in pesticides usage.

The Mill and Estates have achieved major improvement in the program to recycle palm by-products to the field. Hazardous wastes are well controlled for recycling and to prevent soil contamination.

The Estates are continuing to communicate to local communities the elimination of using fire for waste disposal.

The maintenance of groundcover vegetation and installation of roadside silt pits have been improved in order to reduce pollution of streams from soil erosion, for example West Estate has 463 km of roads to maintain which is high for the area of the Estate because of the presence of villages and plasma within the Estate.

PTSIA has continued to work within the customary framework of the Adat Council for addressing applicable issues raised by smallholders and local communities.

3.2 Nonconformities and Noteworthy Positive and Negative Observations (ASA1)

Nonconformities were assigned to Major Compliance Indicators 2.1.1, 4.4.1, 5.1.2 and Minor Compliance Indicators 5.3.2, (6.1.2 assigned during Initial Certification Assessment), 6.1.5. Ten (10) Observations/Opportunities for improvement were identified.

PTSIA has prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSi has reviewed and accepted.

CR10: Indicator 6.1.2 Regular monitoring and management of social impact, with the participation of local communities.

The RKL/RPL preparation did not consult local communities and did not include social impact monitoring results. The social aspect of local communities was not fully assessed and reported.

Corrective Action: To consult the local communities on the social aspects for the preparation of the next RKL/RPL Report.

PTSIA organised a meeting with representatives of the local communities, the Smallholder Cooperative and the Adat Leader during the preparation of the RKL/RPL Report in August 2011. PTSIA provided the BSi Assessors with a copy of the relevant section of the RKL/RPL Report that included of a questionnaire and information on the consultation of local communities as evidence that the work had been carried out. The Nonconformity was closed 30/09/2011.

CR12: Indicator 2.1.1 Evidence of compliance with relevant legal requirements

A Nonconformity was assigned to this Major Compliance Indicator because inspection of a sample of pay records showed a number of instances where workers exceeded the approved overtime limit of 56 hours per month. PTSIA has not applied to the Department of Labour for an extension.

Corrective Action: To apply to the local Labour Department for an extension to the monthly overtime limit. In the interim a system will be implemented for weekly checks on overtime to ensure the limit of 56 hours is not exceeded within the month.

PTSIA provided BSi with a copy of the letter forwarded to the Labour Department on 03 June 2011 and subsequently received verbal advice that the previous regulation limiting overtime hours had been replaced, but is waiting for written

confirmation. PTSIA provided evidence that it had implemented system that requires prior approval of overtime, together with records confirming that overtime during June and July did not exceed the monthly limit.

The BSi Assessors concluded that the controls were effective for achieving compliance with the labour law. The Nonconformity was closed 25/08/2011.

CR13: Indicator 4.4.1 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting

A Nonconformity was assigned to this Major Compliance Indicator because Inspection of the Mill effluent treatment ponds found that repairs to strengthen and increase the height of the walls had been carried out. However, there were several "low spots" where there was insufficient freeboard and there was a risk of "overtopping" and discharge of partially treated effluent from Pond No. 4. Upgrading and strengthening the Pond containment walls was in progress but at the time of the site visit had not yet been completed due to the time required to allow settlement and compaction of the earthen wall.

Corrective Action:

1. To consult with Sime Darby or PT Minamas Engineering Department for their advice on the best method of containment wall construction.
2. To carry out the heightening of the low spots and strengthening of the containment walls.

PTSIA consulted the PT Minamas Engineering Department for technical advice on the civil engineering works required to strengthen and raise the effluent pond walls. PTSIA engaged a contractor who completed the earthworks and made a photographic record of the work carried out. PTSIA provided the BSi Assessors with information of the civil works and the photographic record as evidence that the work had been carried out. The Nonconformity was closed 16/08/2011.

CR14: Indicator 5.1.2 Records of regular report on environmental management in accordance to relevant regulations.

PTSIA has two AMDALs, one for Bukit Ajong Mill and East and West Estates and one for Sei Mawang Estate, therefore two separate RKL/RPL Monitoring Reports need to be prepared. At the time of the visit, an RKL/RPL Report had not been prepared for Sei Mawang Estate.

Corrective Action: Prepare an RKL/RPL Report for Sei Mawang Estate.

PTSIA prepared an RKL/RPL for Sei Mawang and provided BSi with a copy as evidence of meeting this requirement. The Nonconformity was closed 16/08/2011.

CR15: Indicator 5.3.2 Estates and Mills waste management and disposal are implemented to avoid or reduce pollution.

A Nonconformity was assigned for the following issues:

- The West and Sei Mawang Estates landfill sites had no bund to divert/exclude rainfall runoff.

- Improved separation of general refuse is required at the Mill to prevent the disposal of 'green gardening waste' in the landfill.
- At West Estate waste collection needs improving to eliminate refuse disposal on the ground.
- West and Sei Mawang Estates landfills need to be relocated or improve road access for vehicles transporting refuse.
- At West and Sei Mawang Estates Workshops the control of hydrocarbons needs improving to prevent contamination caused by minor spillage of oil.
- PTSIA is in the process of identifying a licensed contractor for removing scheduled waste from the Mill and Estates.

Corrective Action:

- Estate to construct bund at the landfill sites.
- Mill to separate the "green gardening waste" and place at the EFB collection point to be transferred to the field and used as compost.
- To collect domestic waste from the housing twice weekly.
- To relocate the landfill to an appropriate location and improve road access.
- To maintain oil traps and prevent spillage by using drip tray during servicing and repair of vehicles and equipment.
- Identify a licensed contractor for collection of scheduled waste from the Mill and Estates.

PTSIA implemented the corrective actions detailed in the Corrective Action Plan and provided photographs and a copy of records of inspections of pollution control devices. PTSIA also provided a copy of a tender for collection of scheduled wastes by a licensed contractor. **The Nonconformity was closed 16/08/2011.**

CR16: Indicator 6.1.5 Particular attention paid to the impacts of outgrower schemes (where the plantation includes such a scheme)

PTSIA had engaged a consultant to conduct an SIA for PTSIA, but the report had not been finalised and as a consequence information on the impact of the smallholder scheme had not yet been included in the RKL/RPL Report. **OBS13 assigned during the Initial Certification Assessment (Refer Section 3.3 Page 17) was upgraded to a Nonconformity.**

Corrective Action: Follow up with the consultant (Aksenta) to complete the SIA Report and ensure that impacts relating to the Smallholder Scheme are included in the next RKL/RPL Report.

PTSIA carried out consultation with the smallholders and followed up with the consultant Aksenta on the preparation of the SIA.

BSi Assessors will follow up on the completion of the Action Plan for Nonconformity CR16 during the ASA2 visit.

Observations/Opportunities for Improvement (ASA1)

Ten (10) Observations/Opportunities for Improvement were identified:

- OBS01 (4.6.4)** At West Estate used 20 L containers for transporting pre-mixed herbicide to the field were inadequately marked to warn of the contents.
- OBS02 (4.7.1)** Inspection of the Mill and Sei Mawang Estate indicated that PPE hearing protection was not being worn consistently by persons working in 'high noise' areas.
- OBS03 (5.1.1)** The Environmental Aspects Register had not been updated to include, for example, the residual risk associated with the improvement to the effluent ponds, following the recent accident involving discharge of effluent.
- OBS04 (5.1.1)** PTSIA needs to consult with the Ministry of Environment to clarify the status of the Sei Mawang AMDAL, which was approved after the Sei Mawang oil palm development had been completed.
- OBS05 (5.2.2)** At Sei Mawang *Mucuna bracteata* has encroached the buffer zone and needs to be eradicated from the riparian vegetation.
- OBS06 (5.5.2)** An instance of fire being used for disposal of 'garden waste' was observed at West and Sei Mawang Estates housing.
- OBS07 (6.2.3)** The Mill and Sei Mawang Estate list of stakeholders was incomplete because it did not include contact details and it had not been updated since the Initial Certification Assessment. West Estate List of Stakeholders was undated to show it was current.
- OBS08 (6.5.3)** Presently there is no Clinic, Crèche or Kindergarten on site. However, an arrangement is in place with Puskesmas, located in Bodok, to provide medical services. Funding has been approved to construct a Clinic and Crèche 2011/12 and funding will be requested for a Kindergarten in the 2011/12 budget.
- OBS09 (6.5.3)** Presently there is no formal system for residents to register requests for repairs to housing as some "verbal" requests are not being actioned.
- OBS10 (6.5.4)** Presently the agreements with contractors do not specify the requirement to comply with Labour Laws.

Noteworthy Positive Components

- Estates have improved FFB yield.
- Mill has improved OER.
- Herbicide usage has reduced since 2007, particularly glyphosate
- Groundcover vegetation is much improved for preventing soil erosion.
- Relationship with local communities has improved.
- LTI rate has decreased at the Mill and at all Estates

3.3 Status of Nonconformities (Major and Minor Previously Identified (During Initial Certification Assessment))

ASA1 Follow-up of the Nonconformities assigned to Major Compliance Indicators 4.7.1, 5.3.2, 7.1.1, 7.3.1, 7.3.2 and Minor Compliance Indicators 4.4.2, 4.4.4, 5.2.5, 5.6.3, 7.4.2 that were closed prior to the Public Summary Report being submitted to RSPO found that corrective actions were being consistently implemented and the nonconformities remain closed. CR10 assigned to Minor Compliance Indicator 6.1.2 during the Initial Certification Assessment was closed 30/09/2011 – refer Section 3.2 Page 14.

Review of Progress with Observations/ Opportunities for Improvement Previously Identified (During Initial Certification Assessment)

01. (2.1.1) Inspection showed the smoke density recorder had been out of service for more than one month and replacement parts have been ordered from Malaysia – Order No: 0636 dated 27/08/ 2008.

ASA1 Findings: Inspection confirmed the smoke density meter was operational.

02. (4.3.3) Inspection indicated greater attention needs to be given to construction and maintenance of roadside “turnout drains” to improve water management on roads.

ASA1 Findings: West Estate has installed additional silt pits and “turn-out” drains to improve road drainage and has a roadside pruning program.

03. (4.3.5) There has been over-spraying with herbicide along some harvest paths resulting in areas of bare soil exposed to erosion, such as at Block 19, East Estate.

ASA1 Findings: Inspection of fields found that herbicide application was well controlled and limited to “circle and strip” spraying. Groundcover vegetation was relatively uniform at the blocks inspected.

04. (4.4.1) PTSIA has taken the first step of preparing a Plan for reinstatement of riparian buffer zones to the required width. At the time of the Certification Assessment, the boundaries of buffer strips had not been demarcated at locations where palms had been planted too close to the stream.

ASA1 Findings: Inspections found the buffer zones were clearly demarcated and protected, except for Block N811 near Sg Segoli in Sei Mawang Estate, where the buffer zone width was less than the requirement. The Estate undertook to correct this.

05. (4.4.2) The Mill has not yet formalised an overall Water Management Plan that includes all wastewaters.

ASA1 Findings: The Mill and Estates have kept the Water Management Plans up to date.

06. (4.6.3) Field inspection of spraying indicated that some sprayers were not consistently applying chemical to only the target weed species.

ASA1 Findings: Dedicated spray teams have been operating at the Estates with the majority of workers with one and a half years experience. Interview of workers confirmed sound knowledge of spray technique and of the specific treatment for problematic weeds.

07. (4.6.3) Three of the MSDSs at the Estate chemical store were not in Bahasa Indonesia and were not understood by the Storeman.

ASA1 Findings: All of the pesticides were labelled in Bahasa Indonesia and MSDS were available.

08. (4.6.4) At the time of the inspection, the Estate had not kept records of the numbers of used pesticide containers stored. During the audit a stock take was carried out and the Storeman required to maintain up-to-date records.

ASA1 Findings: The storeman maintained up-to date stock take of the wastes in the scheduled waste store.

09. (4.6.7) Interview of a female sprayer indicated that she had previously returned to work as a sprayer while she was still breastfeeding her twelve month old baby but at the time of the Certification Assessment had ceased breastfeeding.

ASA1 Findings: Females are still engaged as sprayers but interviews and inspection of medical surveillance records indicated that if a female sprayer is confirmed pregnant she is transferred to other duties and not permitted to return to work with pesticides until she is no longer breastfeeding.

10. (4.8.1) Interview of the KUD Manager confirmed PTSIA carries out training of Smallholder Group Representatives, although an annual programme has not been documented.

ASA1 Findings: PTSIA has appointed a full-time Assistant Plasma, whose duties include training of smallholder farmers. The Assistant has a training programme with a schedule for Farmer Groups.

11. (5.3.1) A large stockpile of EFB has accumulated at the incinerator but the mill had not identified leachate as a potential source of pollution. The Mill took immediate action and constructed two containment ponds for treatment of the EFB stockpile drainage. This temporary measure was implemented until drainage could be diverted to a sump and transferred to the effluent treatment ponds.

ASA1 Findings: The stockpile of EFB is cleared daily. Inspection confirmed the drainage collection system was still operational for collection of the small quantity of leachate from the EFB.

12. (5.4.1) The mill records daily electricity usage and reports monthly to head office. At the time of the Certification Assessment, the indicator for electricity generation kWh t/CPO had yet to be calculated. This was corrected immediately.

ASA1 Findings: *The electricity usage indicator has been calculated and data are available.*

13. (6.1.5) At the time of the Certification Assessment, PTSIA had not implemented monitoring of the impacts of the smallholder scheme, other than social issues raised by smallholders.

ASA1 Findings: *Monitoring of smallholders has not been carried out. The Observation previously assigned to this Minor Compliance Indicator was upgraded to a Nonconformity.*

14. (6.5.2) During inspection of pay records it was noted that several mill workers had exceeded the approved overtime limit during peak crop months, although there was no recent exceedance. The Mill Manager stated that a system had been implemented for monitoring and control of overtime.

ASA1 Findings: *Inspection of a sample of pay records showed a number of instances where workers exceeded the approved overtime limit and a Nonconformity was issued against Major Compliance Indicator 2.1.1.*

15. (7.1.2) The RKL did not specify the width of buffer zones.

ASA1 Findings: *PTSIA engaged Aksenta to carry out an HCV assessment and the report included buffer zone requirements.*

16. (7.5.2) Additional socialisation is required to improve people's understanding of the Sei Mawang Plasma Scheme. Refer to CAR03 Page 23

ASA1 Findings: *PTSIA had carried out additional socialization and interview of local community confirmed better understanding of the scheme.*

17. (5.2.5) PTSIA has appointed two "Rangers" for monitoring of conservation areas (riparian buffer zones) and will arrange for the TQEM Ecologist to carry out training on site.

ASA1 Findings: *Refer to ASA1 Observation 07 Section 3.2 Page 15. The TQEM Ecologist continued to provide technical support and training for the Estate staff with responsibility for managing riparian buffer zones.*

3.4 Issues Raised by Stakeholders

The issues raised by stakeholders during the Certification Assessment (November 2008) were followed up during this Assessment and found to have been actioned appropriately by the company.

ASA1 Issues

The majority of stakeholders had positive comments about PTSIA. For the situations where stakeholders raised issues, the company's response is included.

Local communities expressed concern over river pollution from Mill effluent. As explained under Indicator 4.4.1 (Page 9), an incident occurred at 6.30 pm on 25 February 2011 involving the loss of treated effluent from the final effluent treatment pond. The effluent flowed into Sg Sengoret, which is used by several small communities as a source of water for bathing and washing. Interview of the Dusun Sg Sengoret Adat Leader found that PTSIA took action immediately and tried to pump the effluent back out of the small creek. PTSIA provided tankers of clean water for local people until the traces of the effluent had disappeared. The Adat Council applied a penalty against PTSIA for the pollution of the small creek, which the company has paid to each affected Dusun. In an article reported in a Pontianak newspaper, a resident of Dusun Sengoret stated the customary processes would not be used as this has not stopped such incidents from occurring. The Adat Leader stated that if an effluent discharge occurs again, the penalty will be increased greatly.

BSi investigated the incident and found that although strengthening of the effluent pond walls was being carried out, the work was incomplete and there was a risk of overflow because of several low sections of the pond walls. BSi assigned a Major Nonconformity, which required civil engineering supervision of the strengthening of the effluent pond walls to minimise the risk of re-occurrence.

PTSIA immediately carried out the engineering work and the Nonconformity was closed. **Please refer CR13 Section 3.2 Page 14 for corrective action and "closeout" details.**

West Estate Spray team asked why CDA spray team was paid differently to Knapsack spray team.

Company Response: *CDA spray team is now being paid on a piece rate, therefore the more area they cover the more they are paid. The Estate plans to change the pay rate for all "field" workers, for example, harvesters, fertiliser applicators and remaining spray teams, to "piece rate".*

The Sei Mawang Catholic Church indicated that PTSIA previously agreed to maintain the access road but this is limited to "patching".

Company Response: *The Estate has developed a new entrance access road. The road by the church will be repaired and will not be used for heavy vehicle access.*

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Date of Next Surveillance Visit

The next surveillance visit will be scheduled within twelve months of ASA1.

4.2 Date of Closing Nonconformities (Major and Minor)**Table 5: Status of Nonconformities**

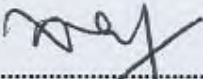
CAR	CLASS	ISSUED	STATUS
CR01	Major	06/11/2008	Closed 31/01/2009
CR02	Major	06/11/2008	Closed 31/01/2009
CR03	Major	06/11/2008	Closed 24/08/2009
CR04	Major	06/11/2008	Closed 31/01/2009
CR05	Major	06/11/2008	Closed 30/04/2009
CR06	Minor	06/11/2008	Closed 30/04/2009
CR07	Minor	06/11/2008	Closed 31/01/2009
CR08	Minor	06/11/2008	Closed 31/01/2009
CR09	Minor	06/11/2008	Closed 30/04/2009
CR10	Minor	06/11/2008	Closed 30/09/2011
CR11	Minor	06/11/2008	Closed 31/01/2009
CR12	Major	01/06/2011	Closed 25/08/2011
CR13	Major	01/06/2011	Closed 16/08/2011
CR14	Major	01/06/2011	Closed 16/08/2011
CR15	Minor	01/06/2011	Closed 16/08/2011
CR16	Minor	01/06/2011	"Open"

4.3 Sign-off of Surveillance Assessment Findings

Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the assessment report contents including assessment findings.

Signed for on behalf of
Sime Darby Plantation Sdn Bhd (PTSIA)

PT. SIME INDO AGRO



.....
Mr Mohd Amri B. Baharudin
Head Zone Sanggau

Date: 26 August 2011

Signed for on behalf of
BSi Group Singapore Pte Ltd



.....
Mr Charlie Ross
Lead Auditor

Date: 29 August 2011

Appendix “A”

SIME DARBY PLANTATION Sdn Bhd

Time Bound Plan

Financial Year	SOU	Main Assessment	Status	Surveillance Assessment	Status
PLANTATIONS - MALAYSIA					
2010 / 2011	SOU 26	Jun-08	Certified in Oct-08	Sep-10	Re-certification approved
	SOU 28, 29, 30 & 30b*	May-08	Certified in Jan-09	Nov-10	*2 nd Surveillance Report submitted to RSPO by SIRIM
	SOU 14	Sep-08	Certified in May-10	Mar-11	1 st Surveillance Report to RSPO by BSi
	SOU 17	Sep-08	Certified in May-10	Mar 11	Assessed by SIRIM, 1 st Surveillance Report pending finalisation
	SOU 8, 9 & 9a**	Jan-08	Certified in May-10	Mar-11	**1 st Surveillance Report submitted by BSi to RSPO
	SOU 21	Feb-09	Certified in May-10	Feb-11	1 st Surveillance report submitted to RSPO by Moody Intl Cert
	SOU 25 & 30a***	Apr-09	Certified in May-10	Apr-11	***Assessed by BSi, 1 st Surveillance Report pending finalisation
	SOU 1	Jul-09	Certified in Aug-10	Jun-11	Planned
	SOU 19a	Jun-09	Certified in Oct-10	Jul-11	Planned
	SOU 20	Jun-09	Certified in Nov-10	Jul-11	Planned
	SOU 19	Jun-09	Certified in Jan-11	Jul-11	Planned
	SOU 27	May-10	Certified in Jan-11	Jan-12	Planned
	SOU 24	Dec-08	Certified in Mar-11	Nov-11	Planned
	SOU 5 & 6	Jan-09	Certified in Mar-11	Nov-11	Planned
	SOU 23	Jan-09	Certified in Apr-11	Nov-11	Planned
	SOU 7	Jul-09	Certified in Apr-11	Mar-12	Planned
	SOU 3	Mar-11	Certified in Jun-11	Mar-12	Planned
	SOU 2, 4, 5a, 18 & 22	Feb-09	Assessed, report pending finalisation with CUC		
	SOU 10, 11, 12 & 16	Jun-09	Public Summary Report submitted by CUC to RSPO		
	SOU 13, 15, 16, 31, 32, 33 & 34	Jun-09	Assessed, report pending finalisation with CUC		

Financial Year	SOU	Main Assessment	Status	Surveillance Assessment	Status
PLANTATIONS - INDONESIA					
2010 / 2011	SOU 13	Nov-08	Certified in Aug-10	May-11	Assessed by BSi, 1 st Surveillance Report pending finalisation
	SOU 1, 14	May-09	Certified in Nov-10	Sep-11	Planned
	SOU 2, 3, 4, & 5	Oct-10	Assessed, report pending finalisation with Mutu Agung		
	SOU 14, 15, 19 & 20	Nov-10	Assessed, report pending finalisation with Mutu Agung		
	SOU 18	Dec-10	Assessed, report pending finalisation with Mutu Agung		
	SOU 6, 7, 8, 9 & 10	Jun-11	Planned		
	SOU 11, 12, 20 & 21	Jun-11	Planned		

*Due to realignment of processing strategy, the SOU 30b mill has been designated as a third party mill with effect from September 2010 and currently is processing 100% crop procured from outside suppliers (non RSPO certified). Crop from SOU 30b estate is currently being processed by SOU 29 mill. Therefore, the Annual Surveillance Assessments were conducted only for SOU 28, 29 & 30. The RSPO certificate for SOU 30b has subsequently been withdrawn.

**Similarly, SOU 9a mill was designated as a third party mill with effect from July 2010 and crop from SOU 9a estate is currently being processed by SOU 8 mill. The RSPO certificate for SOU 9a has since been withdrawn.

***Annual Surveillance Assessment was conducted only for SOU 25 as SOU 30a mill has ceased operation with effect from August 2009. Subsequently SOU 30a was dissolved and the estate has been realigned under SOU 28. The RSPO certificate for SOU 30a has also been withdrawn.

Appendix “B”

CV for New Team Member

Curriculum Vitae of Ismi Makhmudah Edris, STP.

+62.852.143.144.61
ismi.edris@gmail.com

Personal Data

First Name : Ismi Makhmudah
Last Name : Edris
Expertise : Postharvest Technologist
Place, Date of Birth : Wonogiri, June 29th 1986
Nationality : Indonesian
Identity Number (KTP)/Passport : 3312-1269-0686-0003/ T 802.050
E-mail : ismi.edris@gmail.com
Mobile Phone Number : +62.852.143.144.61
Present Address : Nuansa Asri Laladon Blok F No. 9, Laladon, Ciomas, Bogor, West Java, 16610
Permanent Address : Manjung Wetan, RT 01/03, Manjung, Wonogiri, Central Java, 57651

Formal Education

Present Education (2010-now) : Agricultural Machinery and Food Engineering, School of Postgraduate, Bogor Agricultural University (GPA 3.9 scale 4.00)
Latest Education (2004-2008) : Agricultural Post Harvest Technology Study Program, Agricultural Engineering Department, Agricultural Technology Faculty, Bogor Agricultural University (GPA 3.28 scale 4.00). Graduated on October 2008.
Second Latest Education (2001-2004) : SMAN 1 Wonogiri (Senior High School), Science Programme.

Non-Formal Education

2007 : 1st Level on Japanese Class, UPT Language Course, Bogor Agricultural University.
2006 : TOEFL Like Preparation Test, Bogor Agricultural University.
2001-2002 : English Course , LPK Darma Aji, Wonogiri.

Working Experiences

2008 - now : Agricultural Post Harvest Technology Study Program, Project Supporting Staff for “Integrated Supply Chain Management System of Exotic Fruits from ASEAN Region” Sponsored by Asia Invest.

Academic Paper

- 2011 : • Application of Postharvest Technology in Jackfruit [The Jackfruit, January 2011, Studium Press LLC]
- 2010 : • Strategy for Strengthening Post-Harvest Handling to Improve the Competitiveness of Indonesian Horticultural Products [Proceeding of International Seminar on Horticulture to Support Food Security, June 2010, Bandar Lampung]
- 2009 : • Quality Prediction of Mangosteen during Storage using Artificial Neural Network [Proceeding of International Agricultural Engineering Conference, December 2009, Bangkok]
- Effect of Heat Shock Treatment and Aloe Vera Coating to Chilling Injury Induced in Tomato [Proceeding of International Symposium of AESA, November 2009, Bogor]
- The Quality Assesment of Raja Bulu Banana After Storage and Ripen With Artificial Neural Network. [Prosiding of National Seminar Indonesian Informatics Agriculture Association, Agustus 2009, Bogor]
- Reactualization of Food Diversification based on Local Resources, article, October-December 2009, BULOG Food Magazine]
- 2008 : • Optimation Of Input Parameter For Papaya IPB-I (*Carica papaya* L.) Storage With Artificial Neural Network and Genetic Algorithm. [Undergraduate Thesis, October 2008]

Achievement

- 2007-2008 : Scholarship Recipient for Academic Achievement Improvement - Bogor Agricultural University.
- 2007 : Grant Recipient for Enterpreneur Proposals in Student Creativity Programme – DIKTI.

Organization

- 2007 : Community Development Department, Agriculture Engineering Student Association.
- 2006 : Public Relation Department, Agriculture Engineering Student Association.
- 2003 : School Internal Student Organization, SMAN 1 Wonogiri.

Seminars and Trainings

- 2008 : • National Seminar of Agricultural Engineering Association (November).
• National Workshop for Roadmap and Mangosteen Agroindustri Development To Accelerate Mangosteen Export Rate (November).
- 2007 : • Seminar and Expo for Student Creativity Programme (May).
• Auto Cad Training (April).
- 2005 : • Tractor and Heavy Equipment Training and Management (September).
• Job Preparation Seminar (May).
- 2004 : Tractor and Heavy Equipment Training and Management (Desember).

Reference

- Name : Dr. Sutrisno
- Mobile Phone Number : +62.811.113.143
- E-mail Address : kensutrisno@yahoo.com
- Occupation : Lecture of Agricultural Post Harvest Technology Study Program, Department of Agricultural Engineering, Faculty of Agricultural Technology, Bogor Agricultural University.
- Relation : Indonesian Coordinator for Integrated Supply Chain Management System of Exotic Fruits from ASEAN Region Sponsored by Asia Invest.

Sincerely yours,

Ismi Makhmudah Edris, STP

Appendix “C”

ASA1 Programme

ASA1 PROGRAMME – 30 May – 01 June 2011

DATE	TIME	ACTIVITY	CR	RR	IE	IN
Monday 30 May	AM	Opening Meeting	√	√	√	√
		Document Review, Monitoring Data	√			
MILL	AM	Interview Male Workers				√
		Interview Contractors/External Stakeholders				√
		Contact Government Departments; NGOs; Union Officials				√
		Interview Female Office Staff		√	√	
		Review Pay Documentation		√	√	
MILL	PM	Physical Inspection Mill, Effluent Ponds, Land Application, Stores	√			
		Follow-up Stakeholder Issues re Effluent Leak	√	√	√	
		Inspect Housing, Interview Residents		√	√	
		Visit Local Communities				√
		Closing Briefing	√	√	√	√
Tuesday 31 May	AM	Opening Briefing				√
		Physical inspection Estate & Work Tasks (ie Harvesting, Spraying, Upkeep, Fertiliser Application, Stores, Workshop), Inspect Riparian Buffer Zones & Conservation Areas				√
WEST ESTATE	PM	Inspect Housing				√
		Visit Local Community				√
		Document Review				√
		Closing Briefing				√
Tuesday 31 May	AM	Opening Briefing	√	√	√	
		Physical inspection Estate & Work Tasks (ie Harvesting, Spraying, Upkeep, Fertiliser Application, Stores, Workshop), Inspect Riparian Buffer Zones & Conservation Areas	√			
SEI MAWANG ESTATE	AM	Interview Female Fieldworkers		√	√	
		Interview Female Staff/Workers		√	√	
		Inspect Pay Documentation		√	√	
	PM	Document Review	√			
		Inspect Housing Interview Residents		√	√	
		Closing Briefing	√	√	√	
Wednesday 01 June	AM	Visit Smallholder KUD	√		√	
		SPKS Issues re PTMAS				√
		Prepare Visit Report and Closing Presentation		√		
	PM	Closing Meeting	√	√	√	√

Appendix “D”

List of Stakeholders Contacted

LIST OF STAKEHOLDERS CONTACTED

<p>Internal Stakeholders</p> <p>4 Female Mill Staff/Workers 4 Female Estate Staff 7 Female Pesticide Sprayers</p>	<p>Internal Stakeholders</p> <p>6 Harvesters 9 Male Mill Staff/Workers 20+ Residents at Housing 3 Female Guest House Workers</p>
<p>Contractors</p> <p>General Contractor Transport Contractor FFB Supplier</p>	<p>Local Communities</p> <p>Sg Sengoret Sei Mawang KUD Representative Sanggau Catholic Church (Gua Maria) Himado Smallholders Cooperative</p>
<p>Government Departments</p> <p>District Labour Office</p>	<p>NGOs and Others</p> <p>Serikat Petani Kepala Sawit (Organisation for Representing Smallholders) Links (PT MAS consultant)</p>