

PUBLIC SUMMARY REPORT

ANNUAL SURVEILLANCE ASSESSMENT (ASA1)

SIME DARBY PLANTATION Sdn Bhd

Management Unit SOU3 Perak, Malaysia

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TAB	LE of	CONTENTS	Page N°		
SUM	MARY		1		
ABBI	REVIAT	IONS USED	1		
1.0	SCOPE OF SURVEILLANCE ASSESSMENT				
	1.1	Identity of Certification Unit	1		
	1.2	Production Volume			
	1.3	Certification Details			
	1.4	Description of Supply Base			
	1.5	Progress against Time Bound Plan			
	1.6	Progress of Associated Smallholders/Outgrowers towards RSPO Compliance			
	1.7	Organisational Information/Contact Person	6		
2.0		SSMENT PROCESS			
	2.1	Assessment Team Members			
	2.2	Assessment Programme			
	2.3	Stakeholder Consultation	7		
3.0		SSMENT FINDINGS			
	3.1	Summary of Findings			
	3.2 3.3	Identified Nonconformities and Noteworthy Positive and Negative Observations (ASA1) Status of Nonconformities (Major and Minor) Previously Identified (during	14		
	3.3	Initial Certification Assessment)	15		
	3.4	Issues Raised by Stakeholders			
4.0	CER1	TIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY	17		
	4.1	Date of next Surveillance Visit			
	4.2	Date of Closing Nonconformities (Major and Minor)			
	4.3	Sign-off of Surveillance Assessment Findings	17		
LIST	of TAB	LES			
1		GPS Location			
2		uction Tonnages			
3		Fonnages Processed			
4a	_	Profile of SOU3 Palms			
4b		3 Estates and Areas Planted			
5	Stati	us of Nonconformities	1/		
LIST	of FIGU	RES			
1	SOU:	3 Location Map	2		
2	Elphi	l Estate Layout	3		
3		Kellas Estate Layout			
4		uning Estate Layout			
5		(mg/L) of Treated Mill Effluent April – March 2012			
6		age Annual OER (%)			
7		age Annual FFB (t/ha/yr) Yield			
8		ual Mill Water Usage (t/t/FFB)			
9	Annt	ual Mill Energy Usage (kWhr/t FFB)	12		
	-f 455	TAIDIGES			
	-	ENDICES			
A		oly Chain Assessment			
В		Darby Time Bound Plan			
С	ASA.	L Programme			

List of Stakeholders Contacted

Evidence to close Nonconformity CR02

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SUMMARY

BSi Group Singapore Pte Ltd (BSi) has conducted an Annual Surveillance Assessment (ASA1) of Sime Darby Plantation Sdn Bhd Management Unit SOU3 (SOU3) operations comprising Elphil Mill, supply base, support services and infrastructure. BSi concludes that SOU3 operations comply with the requirements of RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance: 2010; and RSPO Supply Chain Certification Standard: November 2011 and the requirements for Mass Balance Mechanism.

BSi recommends the continuation of the approval of SOU3 as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS

AMESU All Malayan Estates Staff Union
BOD Biological Oxygen Demand
CDA Controlled Droplet Application
CHRA Chemical Health Risk Assessment
CPO Crude Palm Oil
DOE Department of Environment
DOSH Department of Occupational Safety & Health
EFB Empty Fruit Bunch
EFB Erech Eruit Bunch

FFB Fresh Fruit Bunch
HCV High Conservation Value
HIRAC Hazard Identification Risk Assessment Control

LTA Lost Time Accident

MAPA Malayan Agricultural Producers Association
 MPOB Malaysian Palm Oil Board
 MSDS Material Safety Data Sheet
 MY-NI Malaysian National Interpretation
 NUPW National Union of Plantation Workers

OSH Occupational Safety & Health

PK Palm Kernel

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
R&D Research and Development
SIA Social Impact Assessment
SOP Standard Operating Procedure

1.0 SCOPE OF SURVEILLANCE ASSESSMENT

1.1 Identity of Certification Unit

The SOU3 Mill and Estates are located in Perak, Malaysia (Figure 1). An additional map showing details of Kamuning Estate is included (Figure 2). The GPS location of the Mill is shown in Table 1.

Table 1: Mill GPS Location

MILL	LONGITUDE	LATITUDE
Elphil Mill (45 t/hr capacity)	101°5'37" E	4°53'24" N

1.2 Production Volume

The production tonnages for CPO and PK for the period from the start of the Certificate (12/08/2010) through to the 31 March 2012 and projected for the next twelve months are listed in Table 2.

Table 2: Production Tonnages

East Palm Oil Mill	СРО	PK
Estimate at Certification 01/07/2010 – 30/06/2011	36,665**	9,125**
Actual 01/04/11 – 31/03/12	37,718* 30,335 <i>**</i>	8,467 * 6,784**
Projected 01/04/12 – 31/03/13	41,880* 32,904 <i>**</i>	9,518 * 7,478 **

Includes Outside Suppliers Production

** = Certified Production

1.3 Certification Details

Sime Darby RSPO Membership No: 035-04(O) BSi RSPO Certificate No: SPO 550180

Initial Certification Assessment: 11 and 12 March 2011

Date of Certification: 18/06/2011

1.4 Description of Supply Base

The Elphil Mill supply base is the three SOU3 Estates that supply the majority of the FFB processed at the mill, small amounts of crop diverted from adjacent Sime Darby Estates and crop purchased from an FFB Trader. The adjacent Sime Darby Estates are RSPO Certified and their crop is included in the Certificate.

Interview of the FFB Trader found that he still only had limited knowledge of RSPO requirements and on this basis the FFB Trader's crop has been excluded from the SOU3 Certificate.

The FFB production from SOU3 Estates, other adjacent Sime Darby Estates and the FFB Trader that was processed at Elphil Mill for the 01 April 2011 – 31 March 2012 reporting period is listed in Table 2. It should be noted that Elphil Mill was commissioned in May 2010 and during the period 01 July 2010 to 31 March 2011 only part of the crop from the SOU3 Estates was processed at the Mill.

Table 3: FFB Tonnages Processed

	Estimate	Actual	Projected
Source	at Initial	01/04/11 -	01/04/12 -
	Certification	31/03/12	31/03/13
SOU3 Estates			
Elphil	45,994	40,137	39,714
Kamuning	94,447	76,681	70,823
Kinta Kellas	25,463	23,617	21,389
Sub Total	165,904	140,435	131,926
Adjacent Sime			
Darby Estates			
Tali Ayer	-	293	_
Sub Total	_	293	_
FFB Trader*			
Tang Tatt	-	34,720	30,000
Sub Total		34,720	30,000
OVERALL TOTAL	165,904	175,448	161,926

^{*} Production from the FFB Trader is not included in the Certificate

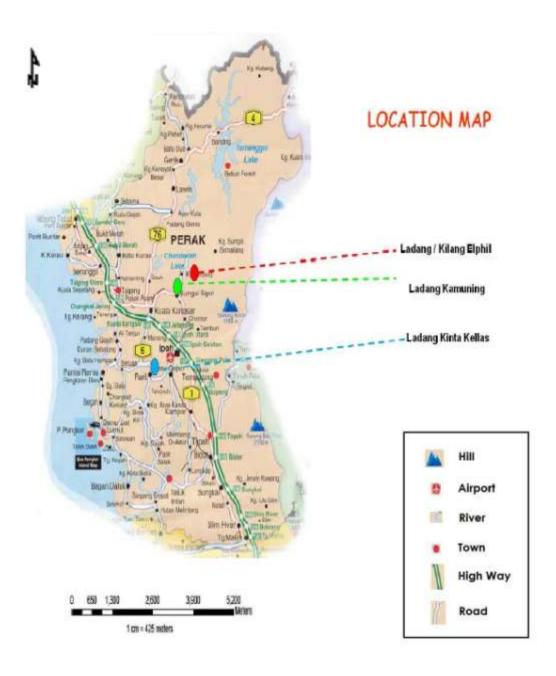


Figure 1: SOU3 Location Map

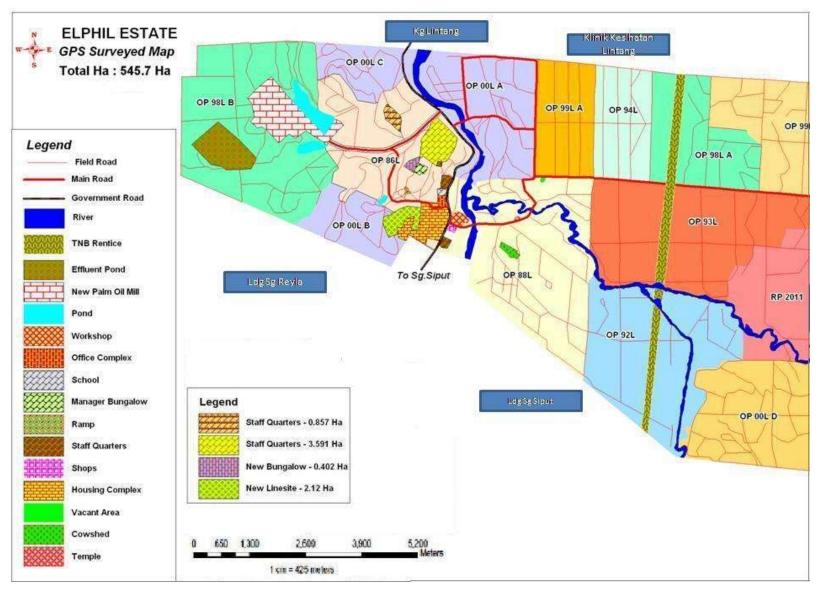


Figure 2: Elphil Estate Layout

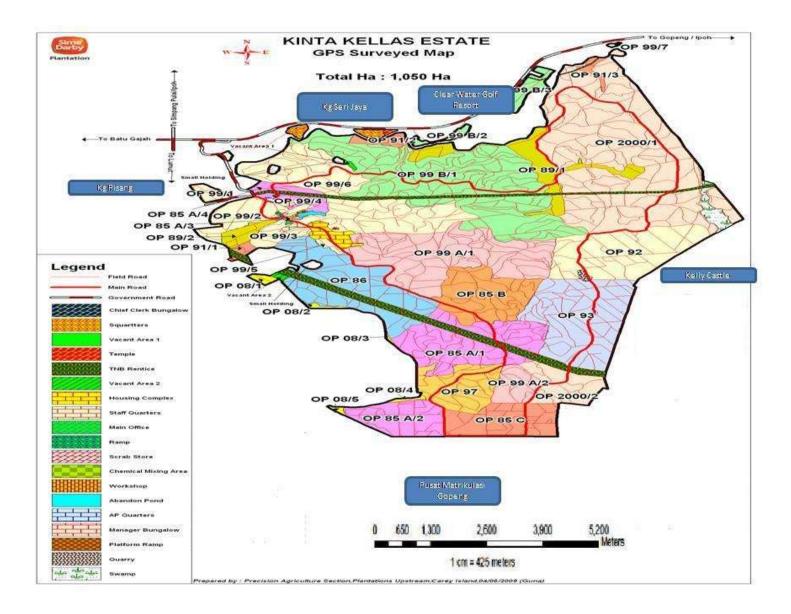


Figure 3: Kinta Kellas Estate Layout

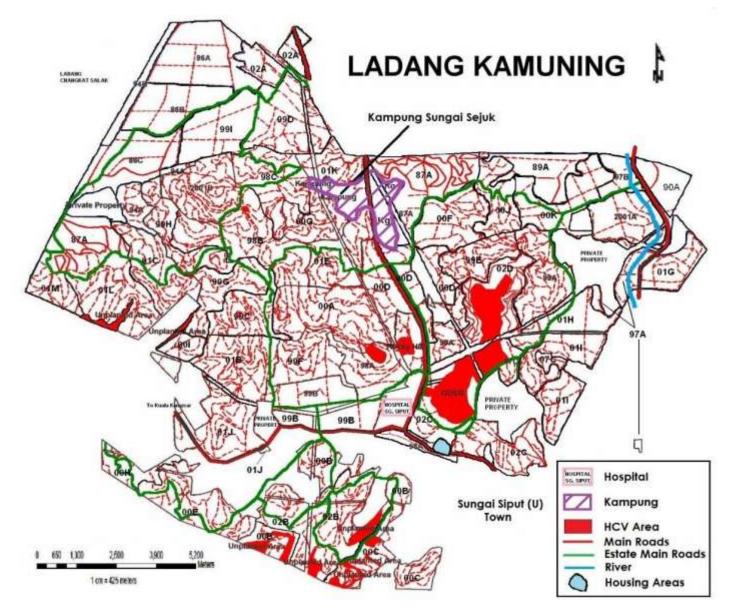


Figure 4: Kamuning Estate Layout

The company owned Estates were developed in the early 1920s initially to rubber. Oil palms were first planted in 1986 and are in the $1^{\rm st}$ and $2^{\rm nd}$ cycles. The age profile of the palms is shown in Table 4a.

Table 4a: Age Profile of SOU3 Palms

ESTATE	AGE (years)	% PLANTED AREA
	21+	11
Flab:I	11 – 20	77
Elphil	4 – 10	2
	0 – 3	10
	21+	4
Kamuning	11 – 20	89
Kamumig	4 – 10	0
	0-3	7
	21+	4
Kinta Kellas	11 – 20	82
Kiiita Kellas	4 – 10	1
	0 – 3	13

The areas of mature and immature palms at SOU3 are detailed in Table 4b for each of the Estates.

Table 4b: SOU3 Estates and Areas Planted

Estate	Mature (ha)	Immature (ha)	Total Area Planted
Elphil	1,506	170	1,676
Kamuning	3,301	259	3,560
Kinta Kellas	826	124	950
TOTAL	5,633	553	6,186

Supply Chain

SOU3 uses the mass balance mechanism for the supply chain. All deliveries of FFB to the Mill are issued with a weighbridge docket that records the details of the supplier, truck registration number, driver's name and the tonnage. The weighbridge system is computerised and the FFB delivery and product despatch records are used as the basis for payment for deliveries and invoicing for shipments, respectively. Inspection of documents confirmed that SOU3 maintains all of the documentation required for verification implementation of the RSPO Supply Chain Certification Standard: November 2011 and the requirements for Mass Balance Mechanism - Refer to Appendix A for details

1.5 Progress against Time Bound Plan

Sime Darby Time Bound Plan (updated March 2012) is included as Appendix B. Sime Darby has achieved RSPO Certification of all 39 of the Management Units in Malaysia, and 12 of the 23 in Indonesia. Sime Darby has completed the Initial Certification Assessments for the remaining 11 Management Units in Indonesia and the assessment reports are pending review by the RSPO. Upon certification of the remaining 11 Management Units, Sime Darby will have achieved the Time Bound Plan.

BSi has continued involvement with assessments of 14 of the Sime Darby Management Units during the 2011/12 period. During this time, Sime Darby has kept BSi informed of issues and claims made against it, as indicated in Appendix B. At the time of preparation of this Report, BSi is not aware of:

- (1) any unresolved significant land disputes;
- (2) any replacement of primary forest or loss of HCVs;
- (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

SOU3 does not purchase any crop from Smallholders, but it has purchased crop from an FFB Trader. SOU3 has not yet made any significant progress with the FFB Trader towards implementing the RSPO Principles and Criteria. The crop from the FFB Trader has not been included in the SOU3 Certificate.

1.7 Organisational Information / Contact Person

Sime Darby Plantation Sdn Bhd Management Unit SOU3 Kilang Kelapa Sawit Elphil 31100 Sungai Siput (U) Perak MALAYSIA

Contact Person: Mr Mohamad Azahar Saat

Manager Elphil Mill

Phone: +605 5940177 Fax: +605 5940167

Email: kks.elphil@simedarby.com

2.0 ASSESSMENT PROCESS

2.1 Assessment Team Members

Charlie Ross – Lead Assessor RSPO
B.App.Sc. M.Sc (Env.Studies)
Topics assessed: Legal, Environment, A

Topics assessed: Legal, Environment, Agricultural Practices, Social, Sustainability

Iman Nawireja – Assessor RSPO B.Ag.Sc. M.Sc. (Comm)

Topics assessed: Legal, Environment, Agricultural Practices, Social, Sustainability

Robyn Ross - Social Assessor RSPO

Topics assessed: Legal, Social, Women and Families, Sustainability

Noryati Hambali - Facilitator (Women and Families)

2.2 Assessment Programme

The ASA1 was carried out 11 – 12 April 2012. The Assessment Programme is included as Appendix C.

The Programme included assessments of Elphil Palm Oil Mill, Elphil and Kinta Kellas Estates against all of the RSPO P&C, Supply Chain Standard: 2011 and applicable indicators.

The Nonconformities that were assigned and the Observations that were identified during the Initial Certification Assessment were followed up to check the effectiveness of corrective actions – refer Section 3.3 Page 15.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interview 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 – refer 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 Aryo Gustomo, BSi RSPO Scheme Manager, 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 SOU3 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 is included at Appendix D.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

During this ASA1, one (1) Nonconformity was assigned against Minor Compliance Indicator 5.3.2. Six (6) Observations/Opportunities for improvement were identified – Refer Section 3.2 Pages 14/15 for details. SOU3 prepared a Corrective Action Plan for addressing the identified Nonconformity, which BSi reviewed and accepted.

The Nonconformities that were assigned to Minor Compliance Indicators 5.3.2 and 5.5.3 and the eleven (11) Observations/Opportunities for Improvement identified during the Initial Certification Assessment were followed up to check the effectiveness of corrective actions. Refer Section 3.3 Page 15 for details. The Nonconformity that was assigned to Minor Compliance Indicator 5.5.3 was upgraded to a Major Nonconformity – refer Section 3.2 Pages 14/15.

BSi recommends continuation of Certification for SOU3 as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

SOU3 has continued to maintain the system for receiving and responding to stakeholder requests for information. The requests received over the past year were from Government and Statutory Authorities and SOU3 replied in a timely manner. Documents such as company policies are available on request.

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 Mill and Estates have maintained records on file of requests for information received from Government, MPOB and other interested parties, together with the response. For example, the Mill received a request on 05 January 2012 from MPOB for a survey on POME and Biogas for Renewable energy Application in Palm Oil Mills, that was replied on 20 January.

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.

Inspection confirmed the Mill and Estate hold copies of each of the management documents listed under Criterion 1.2 and these are publicly available upon request.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

SOU3 has maintained legal compliance with statutory requirements, which can be demonstrated from internal

audits, mill and plantation advisor reports and visits by DOSH and DOE Officers. The Mill and Estates have maintained all licenses and permits current and these are displayed prominently in the Offices. SOU3 has maintained the status quo of 3.39 ha of Kinta Kellas Estate land occupied by Indian Settlers for the past 40 years. Land boundaries have been confirmed by survey and boundary stones are clearly demarcated.

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

Compliance with legal requirements is demonstrated by audit report findings and review of documents and records on site. The Mill and Estates maintain copies of applicable Permits and Licences on display. Checks of a sample of permits indicated all were current. The most recent DOE (17 October 2011) and DOSH (17 January 2012) site visit reports indicated there were no outstanding items that needed to be addressed.

Mill effluent test results are held on file and are graphed to provide information on trend. The test results between April 2011 and March 2012 (Figure 5) showed the quality of treated effluent was less than 45 mg/L.

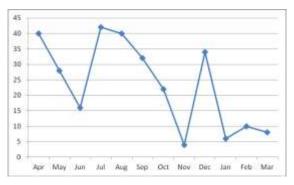


Figure 5: BOD (mg/L) of Treated Mill Effluent April 2011 – March 2012

Environmental Science (M) Sdn Bhd tested mill boiler emissions on 10 January 2012 and the results were well within in compliance with regulation 25 of the Malaysian Environmental Quality (Clean Air) Regulations, 1978. The Mill boiler smoke density meters were calibrated by Yokagawa Electric (M) Sdn Bhd on 08 January 2012. The Mill boiler is fitted with an automatic feeding system for fuel and the records of continuous monitoring of boiler smoke emissions, using a smoke density meter confirmed compliance with regulatory requirements.

The Mill and Estates housing water supplies are from the Government Supply. Electricity is supplied to housing from the Government supply.

The Mill and Estates have maintained the Legal Register (Issue No 1, 11 January 2011) that lists all applicable legislation, together with a summary of compliance requirements, a list of permits and their expiry dates.

Implementation of legal compliance is checked by Internal Audits carried out by Sime Darby Mill Advisory

and Plantation Advisory Department. Sime Darby Group Corporate Assurance Department conducts annual audits that assess legal compliance.

The Sime Darby Standards and Compliance Unit provide legal updates on all applicable legislation throughout Sime Darby. Sime Darby Regional Office provide legal updates on changes to labour laws and worker pay and conditions.

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

The Estates are on freehold land and they hold copies of Land Titles. The oil palm operations are consistent with the land title for agricultural purposes. Sime Darby is in the process of amalgamating the land certificates.

Boundary stones are marked on the ground using red and white poles. Inspection of a sample of the boundary stones at Kamiri Division confirmed that steel pipes painted red and white have been installed beside the concrete boundary stones and were maintained.

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.

All of the Estates operations are on Freehold land. There is no customary land within the SOU3 Estates. Sime Darby does not restrict access through the estates, except in relation to trucks.

There is an encroachment by 18 Indian settlers over 3.39 ha of land at Kinta Kellas Estate. The occupied land was actually part of a linesite and these workers were staying there before. The settlers were permitted to remain there by the previous company when the linesite was demolished and shifted to the present location some 40 years ago. Some of the workers have passed away and their younger generation have continued occupying the area. In the early years they only reared cattle but now they have developed permanent houses on the land. The case has now been brought to Sime Darby Land Department for resolution and is expected to be settled by the end of the year (2012).

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

The SOU3 Mill and Estates have made progress towards achieving their performance production targets for the current financial year. Sime Darby has continued its commitment to long term sustainability and improvements through a capital expenditure programme. Replanting of palms is being carried out progressively.

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

The Estates and Mill have an Annual Operational Budget (2011/12) and Capex Budget that are projected for the

next four years. The budgets include performance objectives and targets related to production, efficiency and quality.

The Mill achieved average OER of 21.49% for the 2010/11 financial year and 21.59% for the year to date, compared to the Budgeted Target for 2011/12 of 22:1%.

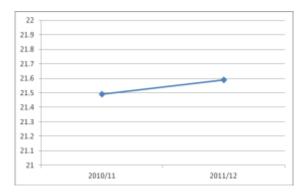


Figure 6: Average Annual OER (%) 2010/11-2011/12

The Estates have a Replanting Programme that is projected to 2020 and was revised in December 2011. Kamuning and Elphil Estates are replanting areas in 2012/13. The SOU3 Estates overall FFB yield has been declining for the past several years due to the replanting programme and the proportion of young palms coming into maturity (Figure 7). It should be noted the 2011/12 yield data are for the year to date (YTD).

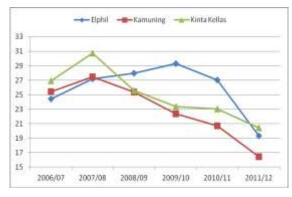


Figure 7: Average Annual FFB (t/ha/yr) Yield 2006-2012 000000000

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

SOU3 has continued to operate the Mill and Estates in accordance with the Sime Darby management systems and practices, under the guidance provided by Mill and Plantation advisor reviews and recommendations for improvements. At the Estates, the replanting program is underway and the reinstatement of buffer strips beside streams is being carried out. The Sime Darby R&D Department has maintained an active interest in the management of soil fertility and optimisation of FFB yields. The establishment of beneficial plants and the

implementation of IPM have continued with the aim of reducing the use of chemicals.

Health and safety continue to be an important priority and improvements have been achieved in the safety record at the Mill as well as the Estates through training and awareness.

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

The Mill and Estates have implemented an integrated environment, quality and health & safety management system. The Estates continue to use the Sime Darby Standard Operating Procedures issued 2 January 2008 as a standard agricultural reference. In addition, the Estates have work procedures in Bahasa Malaysia for operational control for each of the main tasks, including safety issues.

The implementation of SOPs is checked during daily inspection by staff as well as by internal audits. Mill operators record operating parameters hourly on log sheets and the Mill Engineer and Shift Supervisor check these each shift and on a daily basis. The Mill Advisor conducts site inspections twice yearly and the most recent visit was 11 January 2012. The key issues identified related to evacuation of EFB from the mill to the compost site.

The Plantation Advisor visits the Estates six-monthly, with the most recent visit to Kinta Kellas between 15 and 16 February 2012 and the Estate Manager's response to issues raised was prepared on 29 March 2012. The Estates hold copies of previous internal audit reports that include the Manager's response to issues raised and corrective action to be taken.

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

Sime Darby Agronomy Section of R&D Department carries out annual visual inspection of the palms and leaf sampling to monitor palm nutrient status (last visit March 2011) and the information is used for the annual fertiliser recommendation. Soil sampling was carried out in July 2010 and is scheduled to be repeated every 5 years. Approximately 80% of EFB is converted to compost and the balance is applied as mulch to immature palms at replanted areas. The Estates maintain records of the quantity of EFB received from the Mill and the oil palm blocks of immature palms to which it is applied. R&D Department monitors the nutrient status of palms using the results from the foliar sampling to advise on the annual fertiliser requirement to supplement EFB application.

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

The two main soil types are Jeranggau and Rengam, which are sandy and well drained. Immediately following replant, leguminous cover crop consisting of a mixture of *Pueraria javanica*, *Calapogonium caerulum*

and *Centrosema muconoides* is planted to prevent soil erosion. Field inspections confirmed soil conservation practices generally were consistently implemented.

Field inspections also showed improved groundcover following the change from using CDA to knapsack spray equipment.

Heavy rain fell overnight during the visit and field inspections showed the roads were well maintained and accessible by two-wheel vehicle.

Observation 01 – The Mill has installed gabion baskets to stabilise the monsoon drain outfall. The edges of the earthen drain could be protected from erosion by planting vetiver grass – **refer section 3.2 Page 15.**

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

Kinta Kellas has prepared a map showing riparian buffer zones and demarcated the areas prior to replanting. Field inspection at Block 85 confirmed Kinta Kellas had set aside the buffer zone and the steep ravine beside the stream.

Observation 02 – Elphil Estate had not demarcated the riparian buffer strip along a small stream prior to recent replanting and several palms had been planted within the designated 5 metre distance from the stream-bank. The Estate immediately revised the planting plan to include the streamside buffer-strip and transplanted the palms to the correct distance – **refer Section 3.2 Page 15.**

The Mill has monitored water quality of Sg Kerdah upstream and downstream from the mill discharge. The laboratory analysis results indicate no significant difference in quality between upstream and downstream locations.

Daily rainfall is measured at all three SOU3 Estates and records are forwarded monthly to the Drainage and Irrigation Department. Rainfall information is used for the scheduling of fertiliser application. The records show below average rainfall of 1,607 mm during 2011, compared with the average of more than 2,100 mm.

The Mill reports total water usage monthly to Head Office. Water meters were installed and became operational during September 2010 and data are available for complete months since that time except for the boiler water supply. The boiler water meter was repaired and calibrated in June 2011.

The monthly water usage (Figure 8) for the period July 2011 to April 2012 has varied between 0.80 t/t FFB in July to 0.95 t/t FFB in November.

The Mill is on track to achieve the target of $1\cdot0$ t/t FFB for water usage, that was set in the Water Management Plan.

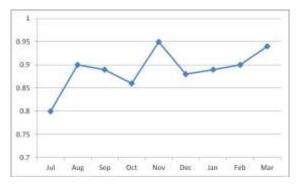


Figure 8: Monthly Mill Water Usage (t/t FFB)

July – March 2012

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

SOU3 Estates have carried out additional planting of the beneficial plants *Turnera subulata* and *Cassia cobanensis* along roadsides for control of leaf-eating insects. The main areas of focus were the roadsides at the newly replanted land. The Estates have maintained records of six monthly census of barn owls as well as records of the blocks where chemical treatment, such as rat baiting, has previously been carried out.

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 followed the Sime Darby Agricultural Reference Manual for recommended pesticide use. In addition, the Estates have prepared a Work Instruction that is displayed at the chemical mixing area with details of the quantities of chemicals to be measured for each particular treatment.

Inspection confirmed the Pesticides Store meets regulatory requirements with respect to spill containment, security, ventilation, separation and labeling of chemicals. Inspection also confirmed only pesticides registered by the Pesticides Board were held. Observation 03 – Kinta Kellas Estate pesticide store could be improved by upgrading the lighting and safety signage to show the required PPE – refer Section 3.2 Page 15.

Kinta Kellas Estate had an outbreak of leaf eating palm pests in early 2012 and needed to apply methamidophos by trunk injection, following approval from the Department of Agriculture (License No: PK/METHA(GL)/12/020 dated 06 March 2012).

All chemicals were labelled in Bahasa Malaysia. MSDSs were displayed in the Pesticides Store for each of the chemicals held. Sime Darby has developed Pictorial

Work Instructions with text in Bahasa Malaysia for chemical mixing and spraying.

Monthly health check for all pesticide operators is carried out by the Hospital Assistant. CHRA medical surveillance has been carried out by a DOSH registered doctor of Edina – Simpang Pulai – Perak, 05 April 2012 for 15 pesticide spray operators of Kinta Kellas Estate and 18 Elphil Estate Pesticide Operators by Klinik Tweedie. The CHRA Reports concluded that all spray operators were fit for duty.

The Estates maintain records of monthly stocktakes of chemicals and information on areas treated is available from daily cost books. The pesticides use information has been summarised with active ingredient and data available since July 2010.

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

The Mill and Estates have continued to implement the Safety and Health Policy approved by Top Management April 2008 that is displayed prominently on notice boards. The Sime Darby OSH Department provides guidance and conducts safety audits at the Mill and Estates. Information on safety is communicated to workers at muster briefings. Inspection of the Mill and Estates workplaces, observation of tasks being carried out and interview of workers indicated employees were aware of safety precautions. Observation 04 – The chemical powder fire extinguishers had recently been serviced, but inspection showed some had been overfilled, indicating the equipment needs to be checked more closely before installing at the Mill – refer Section 3.2 Page 15.

The Mill HIRAC was reviewed for each of the workstations and updated 07 April 2011.

The Mill and Estates have updated the Safety Training Plan for the 2011-12 year. The Estates have prepared a Training Matrix that lists the OSH core competency training for Staff and Workers. The Mill and Estates hold training records, including details of the topic, trainer, list of attendees and signatures.

Inspection of spraying and interview of sprayers indicated operators were working safely and they understand safe work practices.

Inspection of tasks confirmed appropriate PPE is supplied to workers. *Observation 05 – Kinta Kellas maintenance workshop had the incorrect PPE for eye protection for oxy-acetylene welding. The Estate immediately purchased the correct PPE – refer Section 3.2 Page 15.*

The standard issue of PPE to Mill workers is safety shoes, helmet, ear-plugs and high visibility vest.

The Mill has appointed two safety coordinators, the Assistant Manager and the Assistant Engineer. The Field Supervisor at each Estate is responsible for safety coordination.

The Mill and Estates conduct quarterly Safety Committee Meetings with the most recent held (Mill - 14 March 2012 attended by 18 persons). The OSH Committees

discussed accident reports, workplace inspections and issues raised by representatives. The topics discussed are communicated to workers at muster briefing and by the OSH Committee representatives.

The Mill and Estates reviewed the Emergency Response Plans and updated these 5 March 2012 with new contact details for staffing changes.

First aid training was conducted, for example, on 12 March 2012 by Tweedie Clinic for 34 Mill staff and workers. First Aid Training was carried out by the Kinta Kellas Estate Hospital Assistant on 27 February 2012 for 18 staff and workers.

First Aid Kits are available in the Office and at Work Stations in the Mill. The Estates have issued First Aid Kits to Supervisors and Mandors. A sample of Kits was inspected and these were found to be appropriately stocked.

The Mill and Estates maintain records of all accidents. The records showed that the number of LTAs at the Estates has remained static during the past four years. SOU3 is implementing a safety management system with the aim of achieving zero LTAs. The last LTA at the Mill was 06 August 2011, equivalent to 249 days "LTA free".

Malaysian staff and workers are covered by Social Security Organisation (SOCSO) Insurance. Foreign workers are covered under RHB Insurance by Master Policy D08WFWC8606982KL/003 current to 30/06/2012.

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

The Mill has carried out a training needs analysis and used it as the basis for the annual Training Plan 2011-12 that covers competencies required for each Work Station.

Training records have been maintained including details of the topic, trainer, list of attendees and signatures. An example was training in operation and maintenance of the Renold Conveyor Chain for 20 staff and workers on 23 June 2011. Details of awareness training conducted at Mill Monday briefings are recorded in a "Logbook".

The Estates have updated the Training Matrix for the tasks and personnel to be involved. Training in work practices is mostly by informal on-the-job instruction.

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

SOU3 made some improvements for environmental protection, such as the reduction of the BOD of treated effluent. HCV is limited to the riparian buffer strips that are being reinstated during replanting and the company continued to make employees aware of the need to protect HCV and fauna. Scheduled wastes were well controlled, although there was inadequate control of litter at housing and there was some evidence of fire used for disposal of gardening wastes.

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.

The Mill reviewed the environmental impacts for the 2011/12 year on the 02 July 2011. Only minor environmental improvements were identified for the recently constructed Elphil Mill. Examples are the improvement of operator control of the oil recovery system to improve the OER, and the commissioning of a water treatment plant to achieve BOD 20 mg/L.

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.

Practically all plantable land was cleared during the original land development in the early 1920s and remnant vegetation is limited to small areas of steep limestone hills. HCV4 was assigned to remnant vegetation and riparian buffer zones.

Training and awareness of staff and workers has been carried out on company policies that prohibit disturbance of designated protected areas. Signs are maintained at the entrance to the estates prohibiting hunting, fishing and the use of fire. This is supplemented by posters on notice boards at muster areas. Awareness of the protection of fauna has been conducted at Estates muster briefings.

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

The Mill and Estates have maintained the scheduled waste stores and stored materials were labeled, segregated and the inventory up-to-date, in accordance with statutory requirements. The Mill and Estates have engaged Kualiti Alam Sdn Bhd to collect, transport and dispose of scheduled waste (DOE Licence Nos: 000211-000215). Copies were held of Scheduled Wastes Manifests, for example Kualiti Alam Sdn Bhd Serial Number 040414-003 on 24 December 2011 for disposal of spent solvent.

The Estates have developed small landfills for disposal of non-recyclables but inspection showed improvement of refuse at housing was needed and a nonconformity was assigned. CR03 – The management of refuse had not improved to the required standard and there were cases of litter discarded into drains, and lack of drain maintenance resulted in blockage and stagnant water at Main Division and Kamiri Division housing – refer Section 3.2 Page 15.

Observation 06 – Kinta Kellas Landfill could be operation could be improved by installing an earth bund for excluding rainfall runoff and more attention given to waste separation – **refer Section 3.2 Page 15.**

The Mill wastes are transferred to an adjoining site that is operated by a contractor to produce compost. The Mill maintains records of EFB and other palm byproducts tonnages transferred to the composting site. The Mill has continued to operate the flow meter that is read daily for recording the quantity of raw effluent transferred to the compost site. The balance of the raw effluent that is excess to composting requirement is treated in effluent ponds. Treated effluent is applied to the palms in furrows within Elphil Estate.

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

The Mill reports total renewable energy use monthly to Head Office and the data available since mill start-up are shown in Figure 9.



Figure 9: Annual Mill Energy Usage (kWhr/t FFB)

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.

Inspection of replanted areas confirmed palms were felled, chipped and windrowed. Inspection of Kamuning Estate housing found evidence of fire being used at some of the houses for disposal of garden waste. CR02 – Inspection showed the incidence of fire used for waste disposal had reduced, but had not been eliminated at Kamuning Estate Main Division housing. Inspection of Elphil Estate Main Division showed several instances of fire used for refuse disposal (the Nonconformity assigned to this Minor Compliance Indicator during the Initial Certification Assessment was upgraded to a Major Nonconformity) – refer Section 3.2 Pages 14/15.

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

Pollution prevention measures are documented in the Pollution Prevention Plan that was updated on 01 July 2011 for the 2011/12 year. Mill effluent is treated in digestor tanks. Sime Darby is investigating the feasibility of biogas collection from the effluent digestor tanks for reduction of greenhouse gas emissions. An example of pollution prevention at the Mill is the installation of "curtains" around the boiler flyash hopper for minimizing dust emission and construction of an

additional containment wall to prevent ash from entering the monsoon drain.

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

SOU3 has continued to maintain good communication with internal and external stakeholders. There were no complaints or disputes that required resolution through a formal process. The company has maintained support for implementation of the anti-discrimination policy and equitable treatment of female employees. Workers are free to join a union of their choice and the company has maintained a good relationship with contractors. The company makes contributions to local schools and places of worship that are appropriate for the socio-economic setting.

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.

SOU3 updated the SIA improvement plan on 10 April 2012 following the consultation of stakeholders and consideration of issues raised by them.

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.

The Mill and Estates continued to maintain dialogue with internal and external stakeholders and the list of stakeholders was updated and includes suppliers, contractors, community leaders, government departments and emergency contacts.

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.

The SOU3 maintained records of written communications, although there was no complaint received that needed to be handled through the formal complaints system.

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.

There was no land or other commercial dispute that need to be handled through the formal procedures implemented by Sime Darby.

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.

Pay and conditions are consistent with the current MAPA/AMESU Agreement and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement.

Similar to Certification Assessment, interviews of staff and workers confirmed they understood terms and conditions of their contract of employment and received all entitlements outlined therein.

The company provides a good standard of housing for its staff and workers and their families, for example, there is an approved budget 2011/12 for construction of 24 new houses and 8 new houses 2012/13 at Elphil Estate. Primary School is located approximately 1.5km distance and Secondary School at Sg Siput, approximately 8 km distance. Water is supplied to Mill and Estates housing from the Government supply and piped directly to each house. Electricity to houses is from the Government Supply. A Temple and a Mosque are located within walking distance of housing. A Crèche is available for staff and workers children at no cost.

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.

The most recent meeting of NUPW representatives was held on 27 July 2011 attended by 8 representatives and Minutes of the Meeting are available. Interviews of workers indicated they were free to join a union of their choice if they so wished.

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.

At time of hire age is checked by examination of ID Card for local persons. Check of Passports of foreign workers is carried out prior to hire. Children and under-age workers were not observed at any of the Mill or Estates operational areas during the certification assessment.

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.

Inspection of a sample of pay records and interviews of Staff and Workers at the Mill and Estates did not identify any issues related to discrimination.

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.

A statement to prevent sexual harassment and violence is documented in the Sime Darby Social Policy approved by Top Management April 2008. Interview of female Staff and Workers at the Mill and Estates confirmed their knowledge of the Policy and, similar to the Certification Assessment, advised there were no outstanding issues.

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

Sime Darby Marketing Department manages all purchases of outside crop. Information on FFB price is available from the Marketing Department upon request.

Interview of contractors confirmed their understanding of agreements and they considered the contracts are fair, legal and transparent. Contractors also stated that payments are made in a timely manner.

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

The infrastructure in the area is well developed and government services are readily available. When requested, the Mill and Estates make donations to local communities in support of religious festivals, sporting activities and schools.

PRINCIPLE 7: Responsible Development of New Plantings

SOU3 has not carried out any new oil palm developments and there are no plans for expansion of plantings. Principle 7 is therefore not applicable to this Assessment.

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

SOU3 has continued to seek improvements in the efficiency of its performance as a grower and producer of palm oil. Following the initial certification, additional gains have been achieved in the reduction of BOD of treated mill effluent and improvement in mill oil extraction rate. The company has an approved budget for construction of new houses.

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.

Estates ceased using paraquat in 2004 and World Health Organisation Type 1A or Type 1B chemicals have not been used, except for specific situations approved by the Department of Agriculture such as for control of an outbreak of leaf eating palm pests at Kinta Kellas Estate in 2012.

The Mill has continued to look for ways to reduce water usage.

The Mill and Estates have implemented recycling of scheduled wastes and scrap metal from the maintenance workshops.

The Mill and Estates have implemented additional controls for prevention of pollution from point sources, such as the installation of a curtain at the boiler ash hopper to minimise dust.

The company has continued to commit capital funds for improvements to housing.

3.2 Identified Nonconformities and Noteworthy Positive and Negative Observations (ASA1)

The Observation (08) identified during the Initial Certification Assessment against Minor Compliance Indicator 5.3.2 was upgraded to a Nonconformity (CR03). The Nonconformity assigned to Minor Compliance Indicator 5.5.3 (CR02) was upgraded to a Major Nonconformity. Six (6) Observations/Opportunities for Improvement were identified.

SOU3 has prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSi has reviewed and accepted.

SOU3 has made a commitment to implement corrective action for addressing the Nonconformities immediately following the ASA1. The effectiveness of corrective action for the Nonconformity assigned to Minor Compliance Indicator 5.3.2 will be checked at the next Surveillance Assessment, to be scheduled within twelve months of RSPO approval of continuation of Certification.

CR02: 5.5.3 No evidence of burning waste (including domestic waste)

During the Initial Certification Assessment, a Nonconformity was issued against this Minor Compliance Indicator because inspection of Kamuning Estate housing found evidence of fire being used at the majority of houses for disposal of garden waste.

ASA1 Findings: Inspection showed the incidence of fire used for waste disposal had reduced, but had not been eliminated at Kamuning Estate Main Division housing. Inspection of Elphil Estate Main Division showed several instances of fire used for refuse disposal. (Upgraded to a Major Nonconformity)

SOU3 has prepared a Corrective Action Plan for addressing the identified nonconformity that involves:

KAMUNING ESTATE

- Awareness Training on "No Open Burning" has been conducted on 17/04/2012 by the Estate management, in order to stress the importance to maintain a good environment at the labour quarters area.
- Additional sign boards on "No Open Burning" installed at every block of workers quarters.
- Campaign on "Zero Burning" has been conducted by Estate management with effect from 16/04/2012 to 30/04/2012. In conjunction to this campaign, the Estate also will conduct a competition for best worker residence. The best house will be given prize during Labour Day (1st May 2012).
- Estate management will carry out weekly inspections of all houses and residential areas.

ELPHIL ESTATE

- Training for workers on awareness of "No Open Burning".
- Inspection by Hospital Assistant once a week for 1st month, for 2nd month once in two weeks and last 3rd month once a month.
- Erect additional "No Open Burning" signage at public places in the residential area.

The BSi Assessment Team considered the corrective actions were appropriate and the improved controls would be effective for the prevention of use of fire for domestic waste disposal — objective evidence was provided — refer Appendix E. Implementation of corrective actions will be checked during ASA2.

The Nonconformity was closed 29/05/2012

CR03: 5.3.2 Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution

During the Initial Certification Assessment, inspection of Kamuning Estate worker housing found inconsistent management of domestic refuse, with litter scattered around housing and among the adjacent palms, indicating inadequate training and implementation of the Waste Management Action Plan. When this was pointed out by the Assessor, Estate Management took immediate action to remove the rubbish therefore an Observation was assigned.

ASA1 Findings: The management of refuse had not improved to the required standard and there were cases of litter discarded into drains, and lack of drain maintenance resulted in blockage and stagnant water at Main Division and Kamiri Division housing.

The Observation was upgraded to a Nonconformity

SOU3 has prepared a Corrective Action Plan for addressing the identified nonconformity that involves:

KAMUNING ESTATE

- Estate Management had provided rubbish bins and permanent concrete holders to improve domestic waste management. Currently, domestic refuse has been collected by the local authority (Majlis Daerah Kuala Kangsar) at twice weekly.
- Waste management training has been conducted by Estate management on 17/04/2012 to educate and create awareness of the importance to maintain clean worker quarters/residence.
- Priority to monitor the linesite with weekly visits by the Hospital Assistant and report to Estate Manager for further action.

ELPHIL ESTATE

- Inspection by the Hospital Assistant for housekeeping and drain maintenance.
- Awareness briefing to workers during morning muster for maintaining a clean environment at the residential area.

The BSi Assessors considered that the corrective action was satisfactory and appropriate. Progress toward resolution of the issue will be followed up at the next Annual Surveillance Assessment (ASA2).

Observations/Opportunities for Improvement (ASA1)

- Six (6) Observations/Opportunities for Improvement were identified. The progress with the Observations/Opportunities for Improvement will be checked at the next Annual Surveillance Assessment (ASA2).
- **01 (4.3.2)** The Mill has installed gabion baskets to stabilise the monsoon drain outfall. The edges of the earthen drain could be protected from erosion by planting vetiver grass.
- **02 (4.4.1)** Elphil Estate had not demarcated the riparian buffer strip along a small stream prior to recent replanting and several palms had been planted within the designated 5 metre distance from the stream-bank. The Estate immediately revised the planting plan to include the streamside buffer-strip and transplanted the palms to the correct distance.
- **03 (4.6.3)** Kinta Kellas Estate pesticide store could be improved by upgrading the lighting and safety signage to show the required PPE.
- 04 (4.7.1) The chemical powder fire extinguishers had recently been serviced, but inspection showed some had been over-filled, indicating the equipment needs to be checked more closely before installing at the Mill.
- 05 (4.7.1) Kinta Kellas maintenance workshop had the incorrect PPE for eye protection for oxy-acetylene welding. The Estate immediately purchased the correct PPE.
- **06 (5.3.2)** Kinta Kellas Landfill could be operation could be improved by installing an earth bund for excluding rainfall runoff and more attention given to waste separation.

Noteworthy Positive Components

- The Mill has achieved the target BOD for treated effluent of <20 mg/Litre following commissioning the new treatment plant.
- Progress made on the construction of new housing to replace the original timber dwellings.
- Improvement in safety performance.

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

CR01: 5.3.2 Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution

A Nonconformity was assigned as the mill ash bin loading area presently has inadequate containment to prevent spilled ash from entering the adjacent monsoon

drain; and the monsoon drain has not been fitted with a sediment trap to prevent any entrained solids from being discharged off site.

ASA1 Findings: The Mill now uses "Skip Bins" for collection of boiler and fly ash and transport of these materials to the field for disposal. A "curtain" has been installed surrounding the outlet from the ash conveyor for containment of dust. The Mill has installed a trap on the monsoon drain for containment of ash and sediment that may enter the drain.

The Nonconformity was closed 12/04/2012

CR02: 5.5.3 No evidence of burning waste (including domestic wastes).

A Nonconformity was assigned as inspection of Kamuning Estate housing found evidence of fire being used at the majority of houses for garden waste disposal.

ASA1 Findings: Inspection showed the incidence of fire used for waste disposal had reduced, but had not been eliminated at Kamuning Estate Main Division housing. Inspection of Elphil Estate Main Division showed several instances of fire used for refuse disposal.

(Upgraded to a Major Nonconformity – refer Section 3.2 previous Page).

Review of Progress with Observations/Opportunities for Improvement Previously Identified

01 (2.1.1) Inspection of Mill pay records found overtime in excess of the Labour Department maxim (104 hours) had been worked over several months. When this was discovered by Sime Darby during their internal audit a Letter was forwarded to Department of Labour requesting an extension of the overtime hours limit per month. The Mill immediately implemented a system for controlling overtime that requires approvals prior to overtime being worked. Inspection of manual entry records for February and March confirmed this to be implemented consistently.

ASAI Findings: Inspection of a sample of pay records found all overtime hours were within the approved 104 hours per month limit.

02 (2.2.3) In February 2011 SOU3 engaged a contract surveyor to survey the Estate boundaries and to identify the locations of missing boundary stones. Work is expected to be completed during the second quarter of 2011.

ASAI Findings: The surveying of boundary stones has been completed and no over-planting was identified.

03 (4.3.1) The "box stacking" of pruned fronds was inconsistent and needs to be improved at the undulating areas for control of soil erosion.

ASAI Findings: Inspection of a sample of undulating land found box-stacking of pruned fronds was being done consistently.

04 (4.3.2) Areas of bare soil were evident at two of the locations inspected, such as Block 02C, which may

have been due to over-spraying of paths with a mixture of glyphosate and ally.

ASAI Findings: The Estate has ceased using CDA spray equipment and uses only knapsack sprayers. Inspection of Block O2C found the groundcover of soft grasses had improved significantly on harvesting paths.

OBS05 (4.4.1) Control of stream-bank erosion of Sungai Nyamuk could be improved by planting Vetiver grass to supplement the use of sandbags.

ASAI Findings: The Estate planted Vetiver grass along the stream-banks at exposed locations and inspection showed vegetation cover had improved since the previous visit.

06 (4.6.1) The accuracy of measuring the quantity of chemical for mixing with water could be improved by providing appropriate measuring devices.

ASAI Findings: The Assistant Manager calculates the spraymix volume required for the number of sprayers and records this on the Stores Issue Sheet for the Mandor. The measuring devices were appropriate for the volumes required for preparation of bulk spraymix.

07 (5.3.2) At Kamuning Estate housing, several spotted doves Streptopelia chinensis were observed in cages. These birds were likely to have been captured in the Estate, indicating inadequate control of hunting and gathering activities. Estate Management took immediate action to inspect the housing areas and release any caged spotted doves.

ASAI Findings: Inspection confirmed there was no fauna caged or kept as pets at the housing areas.

08 (5.3.2) Inspection of Kamuning Estate worker housing found inconsistent management of domestic refuse, with litter scattered around housing and among the adjacent palms, indicating inadequate training and implementation of the Waste Management Action Plan. When this was pointed out by the Assessor, Estate Management took immediate action to remove the rubbish therefore an Observation was assigned.

ASAI Findings: The management of refuse had not improved to the required standard and there were cases of litter discarded into drains, and lack of drain maintenance resulted in blockage and stagnant water at Main Division and Kamiri Division housing. The Observation was upgraded to a Nonconformity against Minor Compliance Indicator 5.3.2 – refer Section 3.2 previous Page.

09 (5.6.1) The oil/water separator at the Kamuning Estate bulk fuel storage tank requires modification to improve the efficiency of operation.

ASAI Findings: The oil/water separator requires further modification by lowering the level of the "outlet overflow".

10 (6.1.3) Although Local Communities did not identify any issues during the SIA review carried out in

December 2010, it is important there is ongoing consultation to identify any emerging issues.

ASAI Findings: Interviews of stakeholders confirmed an appropriate level of consultation had been maintained.

11 (6.2.3) Kamuning Estate List of Stakeholders could be improved by including local Kampung Leaders, Government Departments and NGOs.

ASAI Findings: The Stakeholder List was revised March 2012 and includes the required stakeholders and contact details.

3.4 Issues Raised by Stakeholders

The issues raised by stakeholders during the Initial Certification Assessment were followed up during ASA1 and found to have been actioned appropriately by the company.

Stakeholders interviewed, both internal and external, had mainly positive comments. Issues raised during the ASA1 interview process and the Company's response is detailed below.

The Mill/Elphil Estate Clinic Hospital Assistant stated as he treated many female patients it would be appropriate for him to have a female assistant.

Company Response: The Estate will hire a female assistant to work at the clinic.

The BSi Audit Team considered SOU3 response to the issue to be acceptable. The issue will be followed up during ASA2 to check on progress and satisfactory resolution.

Foreign harvesters at Kinta Kellas Estate raised issues in relation to the monthly bonus of RM200 as to why local workers receive theirs on a monthly basis but foreign workers are required to wait until the end of tenure to receive the full amount.

Company Response: Head Office Policy states that payment be made at the end of the foreign worker contract as a retention incentive. This will be explained again to the workers.

The BSi Audit Team considered SOU3 response to the issue to be acceptable. The issue will be followed up during ASA2 to check on progress and satisfactory resolution.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Date of Next Surveillance Visit

The next Surveillance Assessment (ASA2) will be scheduled within twelve months of RSPO approval of continuation of Certification.

4.2 Date of Closing Nonconformities (Major and Minor)

Table 5: Status of Nonconformities

CAR	CLASS	ISSUED	STATUS
CR01 5.3.2	Minor	12/03/2011	Closed 12/04/2012
CR02 5.5.3	Minor Major	12/03/2011 Upgraded 12/04/2012	Closed 29/05/2012
CR03 5.3.2	Minor	12/04/2012	"Open"

4.3 Sign-off of ASA1 Findings

SOU3 acknowledges and confirms acceptance of the Assessment Report contents, including assessment findings. SOU3 accepts the responsibility for implementing the corrective actions and addressing the opportunities for improvement detailed in the Assessment Report.

Signed for on behalf of Sime Darby Plantation Sdn Bhd (SOU3)

Mr Mohamed Azahar Saat Manager Elphii Palm oil Mill Date: 2015/12

Signed for on behalf of BSi Group Singapore Pte Ltd

Mr Charlie Ross

Mr Charlie Ross Lead Auditor

Date: 25/06/2012

Appendix "A"

Supply Chain Assessment

<u>APPENDIX A - SUPPLY CHAIN ASSESSMENT REPORT - SOU3 - MASS BALANCE</u>

ELPHIL OIL MILL

Certified Mill Production - 01 April 2011 - 31 March 2012

MILL	CAPACITY	СРО	PK
Elphil	45 t/hr	30,335	6,784

Sales of Certified Mill Products - 01 April 2011 - 31 March 2012

MILL	СРО	PK
Elphil	30,321	6,784

Sales of Certified CPO 01/04/2011 to 31/03/2012

Company	Tonnes
Fima Palmbulk	22,503
Nuri	2,783
Jomalina	4,641
Mewah Oils	394
TOTAL	30,321

Sales of Certified PK 01/04/2011 to 31/03/2012

Company	Tonnes
Sin Huat Hin	1,249
Pangkor	2,187
Sime Futures	2,787
Fleet Palms	561
TOTAL	6,784

Certified FFB Received Monthly - 01 April 2011 – 31 March 2012

Month	Elphil	Kamuning	Kinta Kellas	Tali Ayer	Total FFB/Month
April 2011	4,174.73	6,827.97	1,667.74	-	12,670.44
May	4,057.88	6,557.18	2,143.95	-	12,759.01
June	3,766.01	6,840.20	1,797.39		12,403.60
July	3,773.50	7,711.91	2,529.66	-	14,015.07
August	3,639.72	6,928.28	2,086.70	-	12,654.70
Sept	4,277.60	7,539.32	2,722.57	292.90	14,832.39
Oct	3,629.98	7,523.32	2,028.78	-	13,182.08
Nov	3,432.83	7,109.39	2,177.68	-	12,719.90
Dec	3,111.66	6,931.44	2,224.66	-	12,267.76
Jan 2012	2,470.81	4,905.89	1,722.67	-	9,099.37
Feb	2,156.10	4,339.13	1,488.47	-	7,983.70
March	1,646.40	3,466.70	1,026.52	-	6,139.62
TOTAL	40,137.22	76,680.73	23,616.79	292.90	140,727.64

Certified Company Details

Sime Darby Plantation Sdn Bhd

Management Unit SOU3

Kilang Kelapa Sawit Elphil 31100

Sungai Siput (U) Perak MALAYSIA

RSPO Membership No: 035-04(O)

Contact Person: Mr Mohamad Azahar Saat

Manager Elphil Mill

Phone: +605 5940177
Fax: +605 5940167
Fax: +6044033135

Email: kks.elphil@simedarby.com

RSPO Supply Chain Certification System for Sime Darby Plantation (SDP)

No	Business Unit	RSPO SCCS Certification Y/N	Trading Option	Certification Body	Date of Certification
1	Unimills B.V., Netherlands	Yes	SG, MB	Control Union (CUC)	Interim self assessment in Mac 2009. Certified by CUC on 28 June 2011
3	SD Biodiesel, Malaysia	Yes	SG, MB	SIRIM	Interim self assessment in Mac 2010. Certified by SIRIM on 25 March 2011
4	SD Jomalina, Malaysia	Yes	SG, MB	SIRIM	Certified on 10 March 2011
5	SD Kempas, Malaysia	Yes	МВ	SIRIM	Certified on 19 Aug 2011
6	SD Austral, Malaysia	In Progress	МВ	SIRIM	Awaiting Certification by CB. Main Assessment carried out in Feb 2012.
7	NURI Edible Oil Refinery, Malaysia	In Progress	МВ	SIRIM	Awaiting Certification by CB. Main Assessment carried out in Jan 2012.
8	NURI Edible Oil Kernel Crushing Plant, Malaysia	In Progress	SG, MB	SIRIM	Awaiting Certification by CB. Main Assessment carried out in Jan 2012.

Certification Body Details

BSi Group Singapore Pte Ltd Contact Person: Mr Aryo Gustomo

(Co. Reg. 1995 02096-N) BSi RSPO Scheme Manager

3 Lim Teck Kim Road #10-02 Phone: +65 6270 0777
Genting Centre Fax: +65 6270 2777

SINGAPORE 088934 Email: Aryo.Gustomo@bsigroup.com

Summary

Supply Chain assessment was made at Elphil Mill that is owned and operated by Sime Darby. The assessment included site visits to Elphil Oil Mill and Elphil and Kinta Kellas Estates, review of records and interviews of staff. SOU3 consigned the CPO to four companies and the PK to four separate companies. The assessor concluded SOU3 has implemented an appropriate management system for controlling the purchase of certified FFB, processing of same and sales of certified CPO and PK. SOU3 maintains adequate records for confirming compliance with the RSPO supply Chain requirements (Mass Balance Mechanism) and staff were able to demonstrate an appropriate knowledge of the requirements.

Conclusion

The SOU3 management system and records meet the requirements of the RSPO supply chain requirements, November 2011 for the Mass Balance mechanism.

Certificate Details

Background to the Report

(a) Report authors

Assessor

Mr Charlie Ross, BSi RSPO Lead Auditor

CB Management Representative

Mr Aryo Gustomo, BSi RSPO Scheme Manager

- (b) Previous assessments Not Applicable
- (c) On-Site Visits
 Visit Itinerary

Monday 9 April 2012 – Elphil Mill – Opening Meeting held at Mill Meeting Room; Weighbridge Station; examined weighbridge records; daily records of FFB deliveries, CPO and PK production; CPO Bulk Tank and PK Silo records; shipments of CPO and PK.

People consulted: Mohamad Azahar Saat (Mill Manager); Mohd Aini (Quality Assurance Manager); Azharol Amir (Assistant Mill Manager); Weighbridge Operator; Khiruddin bin Abdul Razak (Elphil Estate Manager); Ahmad Zairil B. Zainal (Kinta Kellas Estate Manager).

Scope

The scope of the assessment covered the Elphil Oil Mill and the supply base of Sime Darby owned Elphil, Kamuning and Kinta Kellas Estates. The Supply Chain mechanism used is Mass Balance. The SOU3 operations were assessed against the requirements of the RSPO Supply Chain Standard: November 2011.

Description of Operation's Management System

SOU3 uses the mass balance mechanism for the supply chain. All consignments of FFB despatched from the Estates to the Mill are accompanied by a Consignment Note with a unique consecutive number and includes details of: Field Number Harvested; block Number; No of Bunches; Date Harvested; Estimated Tonnage; Vehicle Registration Number; Driver's Name and Bin Number.

All deliveries of FFB received at the Mill are issued with a Weighbridge Docket that records the Name of the supplier, Truck Registration No, Driver's Name and the Tonnage. The weighbridge system is computerised and delivery records are used as the basis for payment for FFB deliveries. A sample of weighbridge dockets was checked at the Mill against the summaries of FFB deliveries from each Sime Darby Estate supply source. This confirmed the details of the source and quantity of FFB were recorded accurately and could be verified by tracking. The source of the FFB can be traced back to the Estate and the oil palm block from which it was harvested.

The Mill summarises and reports daily to Sime Darby Head Office: the quantity of FFB received from the Estates; the tonnage of FFB processed; the tonnages of CPO and PK produced; shipment tonnages; and the quantities of materials held in storage. The Mill and Estates also report the above quantities monthly to Sime Darby Head Office.

Checks of a sample of records confirmed SOU3 holds records for shipments of the RSPO Certified CPO and PK produced by Elphil Mill during the preceding 12 months (01 April 2011 – 31 March 2012). Inspection of documents confirmed that SOU3 maintains all of the documentation required for supply chain verification (RSPO Supply Chain Standard November 2011) for Mass Balance mechanism.

Certified Volume Purchased and Claimed

The following certified FFB material was received from SOU3 and adjacent Sime Darby Estates during the 01 April 2011 – 31 March 2012 year and processed at Elphil Mill: 140,728 t/FFB

Main Report Details

1. Documented procedures

- 1.1 The facility 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.

 Complies Procedures are current and include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. For example, SPMS: 2012 Draft/ Appendix 15 Standard Operating Procedure for Traceability and RSPO Supply Chain Certification System.
 - b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard. Complies The Mill Manager has responsibility for the Supply Chain aspects of FFB receipts, processing and shipping of palm products. Interview confirmed their knowledge of the RSPO Supply Chain requirements for the respective areas of the operations.
- 1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB. Complies the Mills Weighbridge SOP covers the receiving of FFB and recording details of the Supplier and Transporter. All deliveries of FFB are subject to verification of documentation and quality checks. For example, MQMS/V1:2008/Level 3/Standard Operating Procedure/Station No. 1/Reception Station/1.3.1:Weighbridge MQMS/V1:2008/Level 3/Standard Operating Procedure/Section V:Introduction/Crop Quality Standards.

2. Purchasing and goods in

- 2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received. *Complies the Mills record tonnages received at the weighbridge and these are reported daily to Head Office.*
- 2.2 The facility shall inform the CB immediately if there is a projected overproduction. *Complies the company has a mechanism for advising the CB of production variations, which are monitored internally.*

3 Record keeping

- 3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements. *Complies Inspection of records at the Mills and at Head Office confirmed these were updated daily.*
- 3.2 Retention times for all records and reports shall be at least five (5) years. *Complies Records are archived and stored for > 5 years*.
- a) The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis. *Complies these are updated monthly.*
 - b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. *Complies*
 - c) The facility can only deliver Mass Balance sales from a positive stock. However, a facility is allowed to sell short. Complies The company sales of Certified CPO and PK did not exceed the production during the 2011 year.
- 3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/MB or Mass Balance. The supply chain model used should be clearly indicated. *Complies The company uses the prefix MB on the Product Code.*
- 3.5 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement. Complies The company has signed contracts with PK Mill.

4. Sales and good out

- 4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:
 - a) The name and address of the buyer;
 - b) The date on which the invoice was issued;
 - c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)
 - d) The quantity of the products delivered;
 - e) Reference to related transport documentation.
 - Complies all of these items (a-e) are included in the company's invoices to buyers

5 Training

5.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems. Complies – The company maintains records of training. Interviews of Mill Staff and Sales Staff confirm knowledge of the Supply Chain requirements.

6 Claims

6.1 The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims. Complies – To the best of the Assessor's knowledge, the company has not made claims outside of the RSPO rules for Communications and Claims.

Appendix "B"

Sime Darby Time Bound Plan

RSPO Certification Timebound Plan for Sime Darby Plantation (SDP)

Financial year (July – June)	Targeted	Achieved
June 2008	5 SOUs	Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment.
2008/2009	20 SOUs (from Malaysia and Indonesia)	a indunesian) completing the NOFO Main Assessment.
2009/2010	20 SOUs (from Malaysia and Indonesia)	
2010/2011	17 SOUs (from Malaysia and Indonesia)	

As of March 2012, RSPO Certification status in Sime Darby Plantation are as follow:

- I. CSPO: To date (as of 1st March 2012) 51 SOUs have been certified with RSPO (39 Malaysian SOUs and 12 Indonesian SOUs).
- II. RSPO Certified volume as of 1st March 2012: 1,830,674 mt of CPO production claimed & 434,063 mt of kernel production claimed.

Status	Malaysia	Indonesia	Total	Remarks
Certified	39	12	51	All SOUs in Malaysia have been certified.
RSPO EB Review	0	11	11	Pending review by RSPO EB.
Assessed/Audited	0	0	0	
Total SOUs	39	23	62	

There were several claims made by NGOs against Sime Darby Plantation operations, and SDP has responded to their claims respectively as the media releases and updates as follow:

- i) Sime Darby's Response to New York Times Article (Jan 2012)
 http://www.simedarbyplantation.com/Sime Darby's Response to New York Times Article .aspx
- ii) False and Inaccurate Reports on Liberian Operations (Feb 2012)
 http://www.simedarbyplantation.com/False and Inaccurate Reports on Liberian Operations.aspx
- iii) Sime Darby Plantation's Response To Oxfam's Press Release (Oct 2011)
 http://www.simedarbyplantation.com/Sime Darby Plantation's Response To Oxfam's Press Release.aspx
- iv) Complaints by Forest Peoples Programme on New Planting Procedure, Liberia (Oct 2011 Feb 2012)

Further to a bilateral discussion with the complainants held at site on 17th Dec 2011, the local communities have written a withdrawal letter to RSPO, for SDPL to proceed with any work in Stage III Gbarpulo areas, an official notification from RSPO is sent to complete the said NPP. Sime Darby is progressing with the Stage III new plantings including land development covering 20,000 ha in Gbarpolu County, Rep of Liberia.

Appendix "C"

ASA1 Programme

ASA1 PROGRAMME - 11 - 12 April 2012

TEAM: CR: Charlie Ross; RR: Robyn Ross; IN: Iman Nawireja; NH: Noryati Hambali

DATE	TIME	ACTIVITY	CR	RR	NH	IN
Wednesday		Opening Meeting	٧	٧	٧	
11 April 2012		Mill Documentation including Supply Chain and Weighbridge	√			
	AM	Interview Contractors	٧		٧	
TEAM 1		Interview Female Office Staff/Workers		٧	٧	
ELPHIL MILL		Review Pay Documentation		٧	٧	
		Inspect Mill, Effluent Ponds, Landfill, Land Application,	٧			
		Workshop, Stores				
	PM	Visit Clinic Interview Staff		٧	٧	
		Inspect Housing and Interview Residents		٧	٧	
		Closing Briefing				
TEAM 2		Opening Briefing				٧
KINTA KELLAS		Inspect Estate and any Buffer Zones				٧
ESTATE	AM	Interview Male Fieldworkers				٧
	Alvi	Inspect Workshop, Stores, Landfill				٧
		Interview Contractors/External Stakeholders				٧
		Inspect Housing				٧
		Visit any Local Communities				٧
	PM	Estate Documentation				٧
		Closing Briefing				
Thursday		Opening Briefing	V	٧	٧	٧
12 April 2012		Inspect Estate including Buffer Zones,	٧			
		Interview Male Fieldworkers				٧
	AM	Interview Female Fieldworkers		٧	٧	
ELPHIL ESTATE	Alvi	Interview Contractors/External Stakeholders				٧
		Inspect Stores, Workshop, Landfill, Contractor's Workshop	٧			
		Interview Female Office Staff/Workers		٧	٧	
		Review Pay Documentation		٧	٧	
		Estate Documentation	٧			
		Inspect Housing and Interview Residents		٧	٧	
	PM	Visit any Local Communities				٧
		Prepare Visit Reports and Closing Presentation		٧	٧	
		Closing Meeting	V	٧	٧	٧

Appendix "D"

List of Stakeholders Contacted

STAKEHOLDERS CONTACTED

Internal Stakeholders 3 Female Mill Staff/Workers 7 Mill/Estate Housing Residents Health Assistant (Mill/Elphil Estate)	Internal Stakeholders 5 Male Harvesters (Foreign) (Kinta Kellas Estate) 2 Female Office Staff/Workers (Elphil Estate) 3 Female Field Workers (Elphil Estate) 1 Female Worker/Resident (Elphil Estate Kamiri Division)
Contractors & Consultants FFB Transport Contractor (Elphil Estate) KRM Mawer Murni Enterprise (Mill cleaning & rubbish collection from mill and housing) Contractor – Mobile Equipment – AMUSU Management Services Sdn Bhd Supplier – Stationery and Office Equipment – Juqman Enterprise	Local Communities Kampung Kinta Kellas Representatives
Government Departments Labour Department Lands and Survey Department Department of Safety and Health Department of Environment	Others AMESU NUPW Perak Branch

Appendix "E"

Evidence for Closing Nonconformity CR02

No	Agenda	Tindakan
1.	Ucapan pembukaan oleh Penolong Pengurus. Penolong Pengurus mengucapkan Assalamualaikum dan selamat pagi kepada semua.	
2.	Latihan Pembakaran Sifar – Ladang Kamuning En. Hazim Md Daud, menerangkan bahawa pembakaran sampah sarap di kawasan perumahan dan ladang Kamuning adalah di larang sama sekali.	Line sweeper/ General worker
3.	Sisa buangan hendaklah di kumpul dan di masukan ke dalam guni yang disediakan.	Line sweeper/ General worker
4.	En. Hazim Ma Daud juga memberitahu bahawa tindakan tatatertib akan di ambil sekiranya masih ada penghuni yang membuat pembakaran terbuka.	Line sweeper/ General worker
5.	Penolong Pengurus memberitahu penekanan dan kesedaran tentang permasalahan pembakaran terbuka akan di kawal selia oleh pihak pengurusan ladang.	Line sweeper/ General worker

(Mohd Hazim Md. Daud) Upkeep Staff (En. Mohd. Shahrizal B. Ithnin) Penolong Pengurus Ladang

s.k Pengurus Ladang Staf/Worker Training

No	Agenda	Tindakan	
1.	Ucapan pembukaan oleh Penolong Pengurus. Penolong Pengurus mengucapkan Assalamualaikum dan selamat pagi kepada semua.		
2.	Pengurusan Sisa Buangan Perumahan, En. Hazim Md Daud, menerangkan bahawa sisa buangan hendaklah di buang di tempat yang di sediakan iaitu di dalam tong sampah.	Line sweeper/ General worker	
3.	Selain daripada itu, sisa buangan pepejal yang boleh di kitar semula seperti kertas, botol plastik, kaca dan sebagainya perlulah di kumpulkan di tong kitar semula yang di sediakan oleh pihak ladang.	Line sweeper/ General worker	
4.	En. Hazim Md Daud juga memberitahu bahawa kerja-kerja pembersihan kawasan perumahan perlu lah di pertingkatkan terutama di kawasan belakang rumah dan juga di parit atau longkang rumah.	Line sweeper/ General worker	
5.	Penolong Pengurus memberitahu penekanan dan kesedaran kebersihan juga akan di tekankan kepada setiap penduduk ladang Kamuning.	Line sweeper/ General worker	

(Mohd Hazim Md. Daud) Upkeep Staff

(En. Mohd, Shahrizal B. Ithnin) Penolong Pengurus Ladang

s.k Pengurus Ladang Staf/Worker Training

BRIEFING FOR NO OPEN BURNING & HOUSE KEEPING AT LINESITE

VENUE: MUSTER GROUND AT KAMIRI DIVISION DATE: 15/05/2012



MUSTER GROUND AT PLANG DVISION DATE: 15/05/2012





Papan Tanda Dilarang Melakukan Pembakaran Terbuka





En. Hazim Md Daud Menerangkan tentang larangan melakukan pembakaran terbuka di kawasan perumahan dan ladang.



Tong sampah yang di sediakan.





En. Azim Md Daud menerangkan tentang pengurusan sisa buangan yang betul kepada line sweeper.



SIME DARBY PLANTATION SDN.BHD KAMUNING ESTATE 17/04/2012

LAPORAN - LATIHAN PENGURUSAN SISA BUANGAN KAWASAN PERUMAHAN.

Kehadiran:

Nama	Jawatan	
Mohd Shahrizal Ithnin	Assistant Manager	
Azran Mat Zen	Assistant Manager	
Mohd Hazim Md. Daud	Staff	
Mageswari	Line sweeper	
D.Krishnamorthy	General Worker	
Amatham	Line sweeper	
Adi	General Worker	
Salmah	General Worker	
Sijah	General Worker	
Jazli	General Worker	
Samandy	Line sweeper	
	Mohd Shahrizal Ithnin Azran Mat Zen Mohd Hazim Md. Daud Mageswari D.Krishnamorthy Amatham Adi Salmah Sijah	

Tidak Hadir:-

No	Nama	Jawatan



SIME DARBY PLANTATION SDN.BHI KAMUNING ESTATE 17/04/2012

LAPORAN - LATIHAN PEMBAKARAN SIFAR (LADANG KAMUNING)

Kehadiran:-

No.	Nama	Jawatan	
1.	Mohd Shahrizal Ithnin	Assistant Manager	
2.	Azran Mat Zen	Assistant Manager	
3.	Mohd Hazim Md. Daud	Staff	
4.	Mageswari	Line sweeper	
5.	D.Krishnamorthy	General Worker	
6.	Amatham	Line sweeper	
7.	Adi	General Worker	
8.	Salmah	General Worker	
9.	Sijah	General Worker	
10.	Jazli	General Worker	
11.	Samandy	Line sweeper	

Tidak Hadir:-

No	Nama	Jawatan
		VI .

LIST OF ATTENDANT

Title: Briefing No Open Burning & House Keeping

Venue: Ground Master Plang Div

Date : 23/4/2012

Time: 06.30 AM

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TRAINING ATTENDANT

Title: Briefing No Open Burning & House Keeping

Venue: Ground Master kemiri Div

Date : 20/4/2012

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Time: 06.30 AM

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