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## PUBLIC SUMMARY REPORT

### RSPO THIRD ANNUAL ASSESSMENT

#### SIME DARBY PLANTATION Sdn. Bhd Strategic Operating Unit (SOU 3) Elphil Palm Oil Mill Perak, Malaysia

*Report Author:*

**Senniah Appalasamy – March 2014**

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BSI Group Singapore Pte Ltd (Co. Reg. 1995 02096-N)  
1 Robinson Road  
#15-01 AIA Tower  
SINGAPORE 048542  
Tel +65 6270 0777  
Fax +65 6270 2777  
Aryo Gustomo: [aryo.gustomo@bsigroup.com](mailto:aryo.gustomo@bsigroup.com)  
[www.bsigroup.sg](http://www.bsigroup.sg)

BSI Services Malaysia Sdn Bhd (Co.Reg. 804473 A)  
B-08-01 (East), Level 8 Block B, PJ8,  
No. 23, Jalan Barat, Seksyen 8  
46050 Petaling Jaya, Selangor  
MALAYSIA  
Tel +6 03-7960 7801  
Fax +6 03-7960 5801

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## SUMMARY

BSi has conducted the Third Annual Assessment (ASA 3) of Sime Darby Plantation Sdn Bhd, Strategic Operating Unit 3 (Elphil palm oil mill and supply base), Elphil certification Unit located in Sungai Siput, Perak, Malaysia comprising one palm oil mill, three company owned oil palm estates, support services and infrastructure. The on-site ASA3 was conducted on 18 – 21 March 2014. BSi concludes that Elphil Palm Oil Mill and supply base operations comply with the RSPO requirements [RSPO P&C MYNI 2010; RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance Assessment; and Supply Chain Certification Standard: November 2011, Module E – CPO Mills: Mass Balance]

BSi recommends continuation of the approval of Elphil Certification Unit's operations as a producer of RSPO Certified Sustainable Palm Oil.

## ABBREVIATIONS USED

AMESU	All Malayan Estates Staff Union
ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
FFB	Fresh Fruit Bunch
HIRAC	Hazard Identification Risk Assessment Control
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
SIA	Social Impact Assessment
SOP	Standard Operating Procedure

## 1.0 SCOPE OF CERTIFICATION ASSESSMENT

### 1.1 IDENTITY OF CERTIFICATION UNIT

The Elphil Palm Oil Mill and three certified estates are located in the District of Kuala Kangsar, Perak, Malaysia. Figure 1 shows the mill and supply base. Figure 2 and 3 shows the location of Kinta Kellas estate and Kamuning estate which were sampled and assessed. The GPS location of the Mill is shown in Table 1.

**Table 1: Mill GPS Locations**

MILL	Longitude	Latitude
Elphil Palm Oil Mill ( Capacity: 45 mt/hr)	101°5'37" E	4°53'24" N

## 1.2 PRODUCTION VOLUME

The actual production tonnages for CPO and PK for the ASA2 period (01/04/2013 – 31/03/2014) and projected for the next twelve months (April 2014 – March 2015) are listed in Table 2

**TABLE 2: PRODUCTION TONNAGES**

Elphil Palm Oil Mill	CPO	OER	PK	KER
Estimate at ASA 2: 01/04/13 - 31/03/14	39,052* 32,662**	22.40	9,754* 7,817**	5.60
Actual for ASA 2: 01/04/13 -31/03/14	35,179* 24,623**	21.37	9,432* 6,967**	5.73
Projected for ASA3 01/04/14 - 31/03/15	39,091* 30,515**	21.44	9,827* 7,671**	5.39

Note: \* Includes Outside Suppliers Production

\*\* Certified production tonnage

## 1.3 CERTIFICATION DETAILS

Sime Darby RSPO Membership No: 1-0008-04-000-00  
[035-04(Old number)]

BSi RSPO Certificate No: SPO 550180

Initial Certification Assessment: 11 and 12 March 2011

Date of Certification: 18/06/2011

Date of ASA1: 11 – 12 April 2012

Date of ASA2: 9 – 12 April 2013

Date of ASA3: 17 – 21 March 2013

## 1.4 DESCRIPTION OF SUPPLY BASE AND SUPPLY CHAIN

The Elphil Mill supply base is consist of three company own estates that supply the FFB processed at the Elphil palm oil mill. Beside own company's FFB, Elphil palm oil mill purchasing FFB from a FFB Trader. The trader does not have any plantation but buys FFB from smallholders. Due to the outside FFB purchased, the palm oil mill is using Mass Balance supply chain model. The FFB production from Elphil Certification Unit's supply base estates and the FFB Trader that was processed at Elphil palm oil mill for the period 01 April 2013 – 31 March 2014 and projection for next 12 months are listed in Table 3. It was noted that the projection for trader increased. Overall estate projection reduced 1% due to replanting activity.

**Table 3: FFB Tonnages Processed**

Source of FFB	Estimate (ASA2) 01/04/13- 31/03/14	Actual (ASA2) 01/04/13 - 31/03/14	Projected (ASA3) 01/04/14 - 31/03/15
Elphil Estate	46,928	36,320	41,988
Kamuning Estate	76,822	61,464	79,122
Kinta Kellas Estate	20,542	17,440	21,218
<b>Sub Total**</b>	<b>144,292</b>	<b>115,224</b>	<b>142,328</b>
<b>FFB Trader*</b>			
Tang Tatt	30,000	49,398	40,000
<b>GRAND TOTAL</b>	<b>174,292</b>	<b>164,622</b>	<b>182,328</b>

Note: \* Production from the FFB Trader is not included in the Certificate.

\*\* Certified FFB

Figure 1: Location of Elphil Mill and three certified estates in Perak, Malaysia

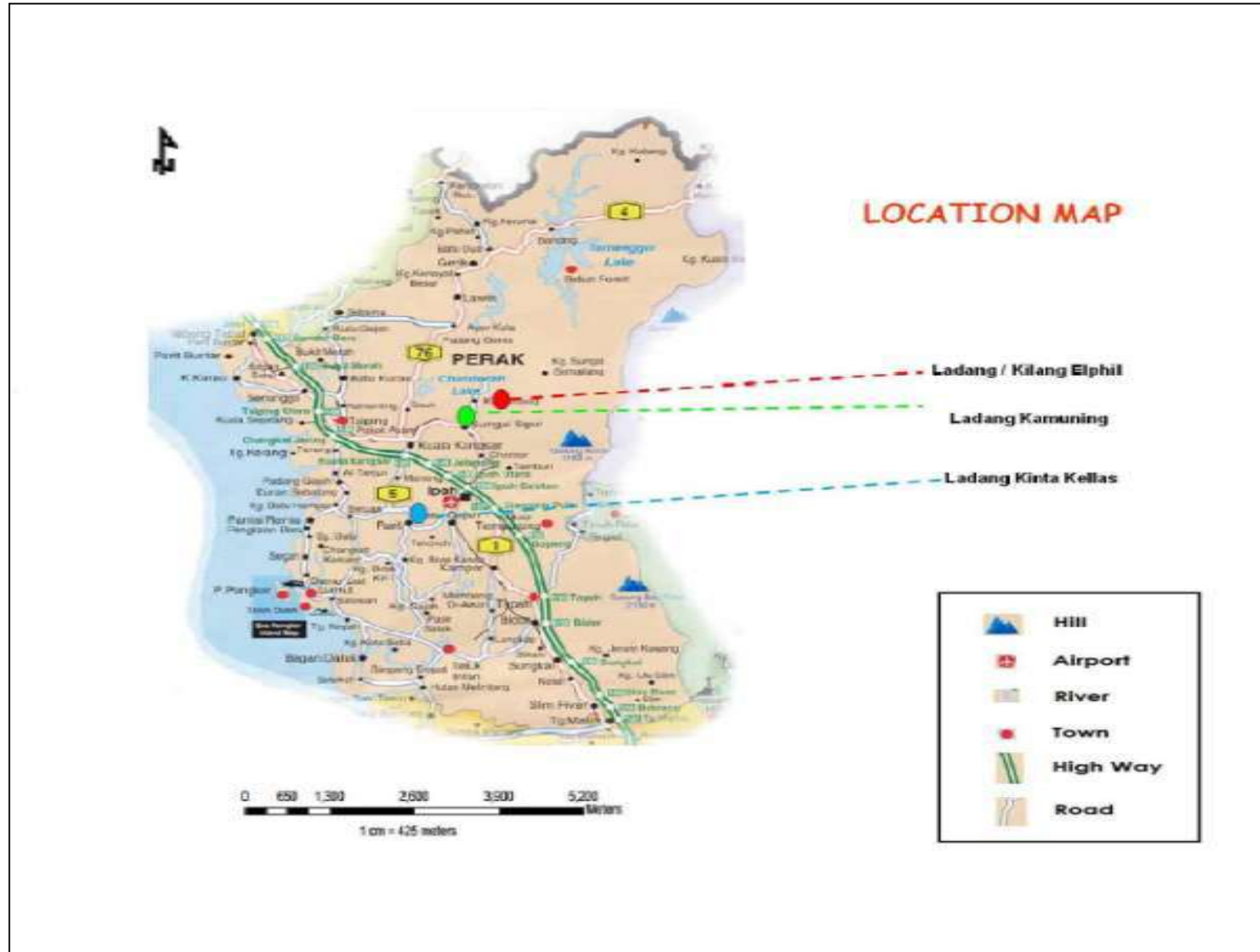


Figure 2: Kinta Kellas Estate Map

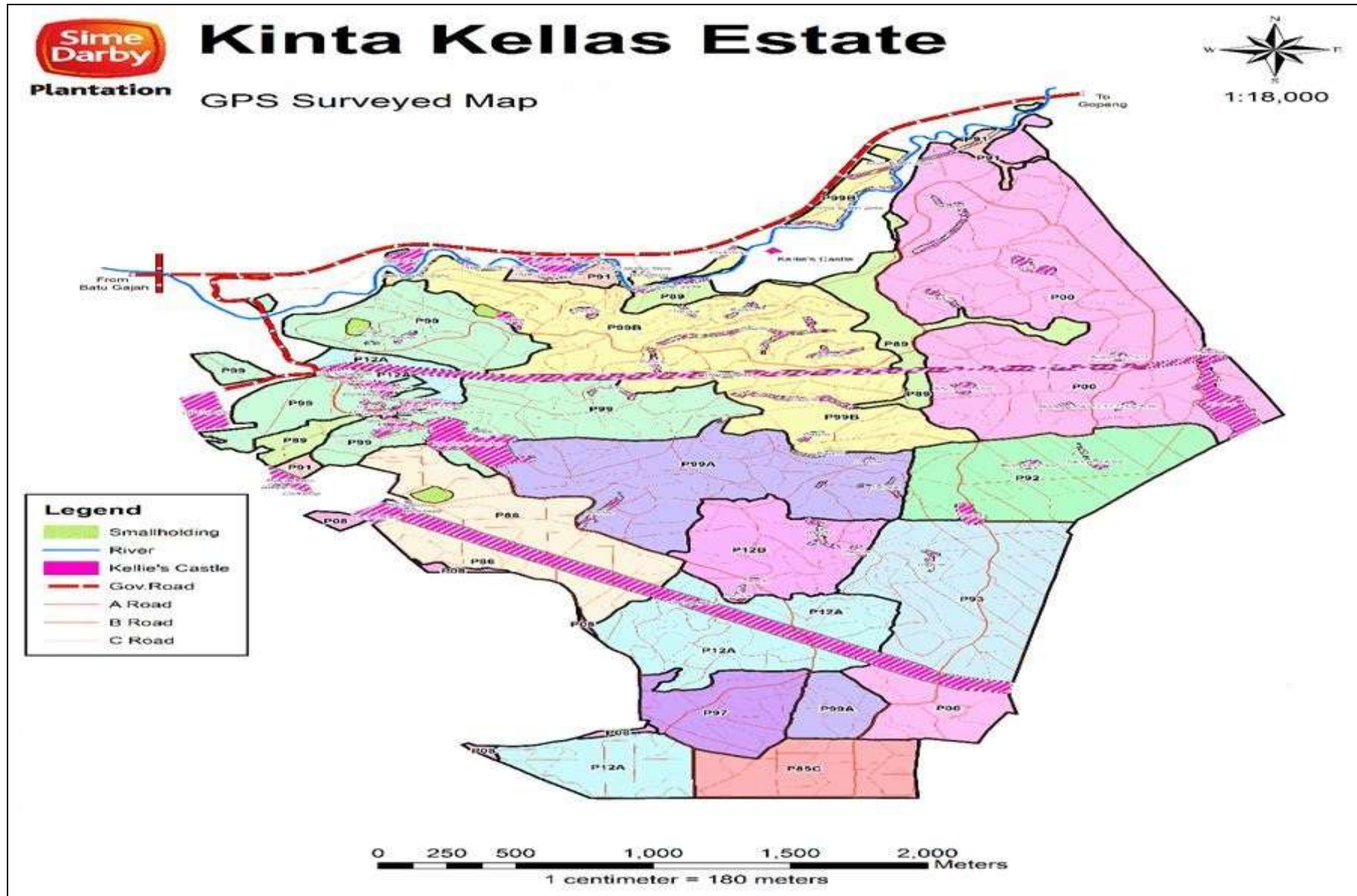




Figure 3: Kamuning Estate Map



The company owned Estates were developed and planted with oil palms in 1986 and are in the 1st and 2nd cycles. The age profile of the palms is shown in Table 4a and the areas of mature and immature palms at SOU3 are detailed in Table 4b for each of the Estates.

**Table 4a: Age Profile of Palms**

<i>Estate</i>	<i>AGE (years)</i>	<i>% of PLANTED AREA</i>
Elphil	0-3	4.53
	4-8	10.25
	9-14	21.54
	15-18	40.54
	19-25	16.98
	25+	6.16
Kamuning	0-3	8.70
	4-8	1.49
	9-14	51.32
	15-18	29.88
	19-25	3.99
	25+	4.62
Kinta Kellas	0-3	23.05
	4-8	0.53
	9-14	20.85
	15-18	38.05
	19-25	17.52
	25+	0

**Table 4b: Estates and Areas Planted**

<i>Estate</i>	<i>Total Land Area</i>	<i>Mature (ha)</i>	<i>Immature (ha)</i>	<i>Total Planted Area (ha)</i>
Elphil	1,876	1,600	76	1,676
Kamuning	3,889	3,250	310	3,560
Kinta Kellas	1,061	731	219	950
<b>TOTAL</b>	<b>6,826</b>	<b>5,581</b>	<b>605</b>	<b>6,186</b>

The total area is 6,826ha. Total planted area is 6,186ha. The balance area from the total land area utilised for infrastructure and about 9.71ha is set aside as biodiversity area. All the immature area is replanted area. No new planting.

### **Supply Chain**

Elphil certification Unit (Elphil Palm Oil Mill) uses the Mass Balance (MB) supply chain model for the entire certified palm production due to the non-certified FFB received from the trader. 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. Similar to last assessment the mill's weighbridge system is computerised. FFB received and product (CPO and PK) despatch records are complete with supply chain model indicated on the deliveries and invoicing for shipments.

Inspection of documents confirmed that Elphil Palm Oil Mill maintains all of the documentation required for verification of implementation of the RSPO Supply Chain Certification Standard: November 2011 and the requirements for Mass Balance Mechanism – Refer to Appendix E for details.

### **1.5 Other Certification Held**

Elphil Palm Oil Mill: 5S Certificate valid until 18/03/2014 (Certificate No. AC3337). (Re-Certification is on-going).

Kamuning Estate: Code Of Good Nursery Practice Certificate from MPOB valid until 16/04/2016 (Certificate No. MPOB-CoP/NN/0163)

### **1.6 Organizational Information / Contact Person**

Sime Darby Plantation Sdn Bhd

Management Unit SOU3

Kilang Kelapa Sawit Elphil, 31100

Sungai Siput (U), Perak

MALAYSIA

Contact Person: Mr. Azman Talkah  
Manager Elphil Mill

Phone: +605 5940177

Fax: +605 5940167

Email: [kks.elphil@simedarby.com](mailto:kks.elphil@simedarby.com)

### **1.7 Progress against Time Bound Plan**

Sime Darby Time Bound Plan is included as Appendix A. There are total of 59 Certification Units within Sime Darby Plantation (34 in Malaysia and 25 in Indonesia). As per the time bound plan, Pagoh palm oil mill and Sua Betong palm oil mill which was newly commissioned end of 2012 was certified on 28 January 2014 (Pago) and February 2014 (Sua Betong). Based on this achievement, Sime Darby Plantation has achieved RSPO Certification for all the 34 Management Units in Malaysia.

There are 25 Management Units in Indonesia. 21 Management Units in Indonesia has achieved RSPO Certification. There are 4 certification units in Indonesia was audited and summary report is being RSPO peer reviewed. Upon certification of the remaining Management Units, Sime Darby will achieved and complete the Time Bound Plan for RSPO certification.

BSi has continued involvement with assessments of Sime Darby Management Units during the 2013/14 financial year period. During this time, Sime Darby has kept BSi informed of any issues and claims made against it. At the time of preparation of this Report, BSi is not aware of:

- Any unresolved significant land disputes;
- Any replacement of primary forest or loss of HCVs;
- Any labour disputes that are not being resolved through an agreed process;
- Any evidence of noncompliance with any law at any of the landholdings.

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

### **1.8 Progress of Associated Smallholders/Out growers towards RSPO Compliance**

Elphil Palm Oil Mill purchase FFB from a trader. There is no FFB purchased from Smallholders. The FFB Trader is not an out-grower but purchase FFB from surrounding smallholders. The trader does not have a plantation. The crop from the FFB Trader is excluded in the Elphil Certification Unit's certified palm product.

## **2.0 ASSESSMENT PROCESS**

### **2.1 Certification Body**

BSi Group Singapore Pte Ltd  
1 Robinson Road  
#15-01 AIA Tower  
Singapore 048542

RSPO Scheme Manager: Mr Aryo Gustomo  
Phone: +65 6270 0777  
Fax: +65 6270 2777  
Email: [aryo.gustomo@bsigroup.com](mailto:aryo.gustomo@bsigroup.com)

BSi is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSi Standards is the UK's National Standards Body. BSi provides independent, third-party certification of management systems. BSi has a Regional Office in Singapore, and an Office in Kuala Lumpur, Jakarta and Bangkok.

### **2.2 Qualifications of the Lead Assessor and Assessment Team**

#### **Senniah Appalasamy - Lead Assessor**

He holds degree in Resource Economics from Agriculture University, Malaysia. He has vast experience in Plantation crop management covering oil palm plantation, rubber, cocoa and pepper for more than 10 years. He is also experience in manufacturing sector as a quality controller and production management. He is involved in RSPO implementation and assessment since 2008 as a team member and subsequently as a lead auditor with RSPO approved certification body covering assessment with RSPO P&C, RSPO SCCS, RSPO NPP and RSPO Group Certification in Malaysia, Indonesia and Thailand. He has completed ISO 9001:2008, RSPO SCCS awareness training, RSPO Lead Auditor Training Course, RSPO SCCS Lead Auditor Training Course, RSPO – RED Lead Auditor Training Course, International Sustainable Carbon Certification (ISCC) Lead Auditor training, Sustainability Report Assurance (SRA) Assessor Training, ISO 14001 Lead Auditor Training Course and OHSAS 18001 Lead Auditor Training Course. Besides RSPO, he is also qualified as ISCC lead auditor and SRA Lead Assessor. He have experience in other standards i.e.

Global Gap Option 1 and 2 (Fruit, vegetable and aquaculture) and GMP B+ as team member.

#### **Muhammad Haris B. Abdullah – Team member**

He graduated from the Open University Malaysia with a Bachelor of Business Administration (Hons) Majored in Human Resource Development and completed his Master's Degree in Business Administration from the University Utara Malaysia in January 2014. He has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture, agriculture best practices, and environmental impact assessment and workers welfare. He completed the RSPO Lead Auditor Training in April 2013 and passed the course. He is also passed the ISO 14001 Lead Auditor Training, OHSAS 18001 Lead Auditor Training Course and qualified as EICC auditor. He has completed International Sustainable and Carbon Certification (ISCC) Lead Auditor Training Courses. He had assisted with conducting audits of oil palm plantation for more than 7 companies against the RSPO P&C in Indonesia and in Malaysia for the past 4 years. During this assessment, he assessed on the aspect of Safety and Health, Legal, Social and community engagements, Stakeholders consultation, and workers welfare.

### **2.3 Assessment Methodology and Programme**

The on-site ASA3 was carried out on 18 – 21 April 2013. The Assessment Programme is included as Appendix C. The Programme included assessments of Elphil Palm Oil Mill as the Certification Unit. Kinta Kellas and Kamuning Estates were sampled, and Elphil Estate was visited to verify the implementation of the observation raised during ASA2. All the operating units were assessed against RSPO P&C MYNI 2010; RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance Assessment; and Supply Chain Certification Standard: November 2011, Module E – CPO Mills: Mass Balance.

The Nonconformities that were assigned and the observations that were identified during the ASA2 were followed up to check the effectiveness of corrective actions – refer Section 3.3. All the nonconformities are remains closed. Summary of the previous nonconformities and status of close out date is provided in Section 4.2.

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. 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.

#### **2.4 Stakeholder Consultation**

Internal and external stakeholders were consulted to obtain their views on SOU3: Elphil Palm Oil Mill and Supply Base's environmental and social performance and any issues or concern that they might have. External stakeholders were interviewed in private and they were invited to the Mill and estate for a private meeting. Those unable to attend were met at their premises. Internal stakeholders such as workers, their families, contractors, suppliers and staff were interviewed in groups in the workplace and at the housing site. A list of stakeholders contacted is included at Appendix D.

### **3.0 ASSESSMENT FINDINGS**

#### **3.1 SUMMARY OF FINDINGS**

During the ASA3, a major nonconformity and a minor nonconformity was raised against the RSPO P&C requirement. Along with this an observations for improvement were identified - Refer to Section 3.2 for details. Elphil Certification Unit prepared a Corrective Action Plan for addressing the identified nonconformities, which was reviewed and accepted by the BSi audit team.

The minor nonconformities that were assigned during the ASA2 and the Observations/Opportunities for Improvement identified were followed up to check the effectiveness of corrective actions. The minor nonconformity was closed during the ASA3. Refer Section 3.3 for details.

With the successful close out of the major nonconformity, previous minor nonconformity and observations, BSi recommends continuation of Certification for Elphil Palm Oil Mill and supply base as a producer of RSPO Certified Sustainable Palm Oil.

#### **PRINCIPLE 1: Commitment to Transparency**

SOU3 has continuously maintained the system for receiving and responding to stakeholder requests for information. The requests for information received over the past year were from external stakeholders such as Labour Department, Health Department, MPOB, DOE, DOSH and SOU3 had 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 Departments such as Labour Department, District and State Health Departments, DOSH, MPOB and other interested parties, together with the response. For example, Officer from State Labour Department visited Kamuning estate on 3/10/2013 to ask for information on workers. This was recorded and attended on the same day. Officer from State Health Department and District Health Department visited on 20/3/2014 and information regarding water analysis was provided by the management.

**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.**

Document review shows the Mill and Estate hold copies of each of the management documents listed under Criterion 1.2 and these are publicly available upon request by any stakeholders such as land titles, safety and health plan, plans and impact assessments relating to environmental and social impacts, pollution prevention plans, details of complaints and grievances, negotiation procedures and continuous improvement plan.

#### **PRINCIPLE 2: Compliance with Applicable Laws and Regulations**

Legal compliance with statutory requirements is assessed annually to ensure compliance. Legal and Other Regulation Register is updated whenever new regulation related to the operation is identified. Internal audits, mill and plantation advisor reports and visits by DOSH and DOE Officers further confirm that there is no any infringement against applicable law. The Mill and Estates have maintained all licenses and permits which are valid and these are displayed prominently in the Offices similar to last assessment. Land boundaries have been confirmed by survey and boundary markers are clearly demarcated and were confirmed during the field visit.

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

Compliance with legal requirements is demonstrated by all operating units through internal and external audit report findings and review of documents and records on site during this assessment. The Mill and Estates maintain copies of applicable Permits and Licences. Sample of permits inspected reveal that all valid. The most recent visit by Labour department on the 3 October 2013, State Health Department on 20 March 2014 did not identify any noncompliance. Group Compliance and Assurance Department audit was conducted on 1 July 2013 and 20 December 2013 did not find any issues related to operation. Similarly, no issues

raised during the internal Environmental Safety and Health monitoring by PSQM-ESH Department.

Mill effluent BOD test results dated 25 February 2014 is range 46ppm which are lower than approved limit of 50ppm are held on file (Report No.: EP55/2014).

Similar to ASA2, the Sime Darby Standards and Compliance Unit provide legal updates on all applicable legislation throughout Sime Darby. Sime Darby Regional Office provides legal updates on changes to labour laws and worker pay and conditions such as the minimum wage order and compliance was found during this assessment. The Legal and Other Regulation Register is updated and current.

***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. Inspection of a sample of the boundary stones at Kenta Kellas and Kamuning Estate confirmed that boundary markers are clearly maintained and installed beside the concrete boundary stones and were visibly seen during the field visit.

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

The issue of the settlers covering 34 Indian settlers over 3.39 ha of land at Elphil Estate (Kamiri Division) was followed up during this assessment. As for the background of the issue, the occupied land was actually part of a line site and these workers were staying there before. The settlers were permitted to remain there by the previous company when the line site 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.

Sime Darby Land Department had a meeting on 28 March 2013 with Perak state government regarding this issue just before the last assessment. The state government has agreed to build new housing for the settlers in government reserve land under village planning “Rancangan Perkampungan Tersusun” at Sungai Nyamuk district. Sime Darby has been requested to build a bridge to allow access to the new housing area by the state government and was agreed. This whole project is expected to be completed by end of 2015.

During this assessment, interview with the settler’s representative confirmed that the arrangement has been made and accepted by the settlers as per confirmed during the last assessment. There was a recent meeting held again with the relevant government

department involving District Officer, District Land Department officers, Head of Sime Darby Land Department, Estate managers on 17 December 2013. Sime Darby Land Department is waiting for the approval from District Land Department to proceed with the project. It was noted that the project of building the bridge will be commence upon the approval from government.

***PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability***

Elphil Palm Oil 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. Construction of new housing for the workers is also budgeted for the 2014/2015 Financial Year as a continuation of 2013/14 Financial Year.

***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 (for FY 2013/2014) and Capex Budget that are projected for the next five years (2014 – 2018). The budgets include performance objectives and targets related to production, efficiency and quality covering cost of production yield per hectare, OER, KER etc.

The Mill achieved actual average OER of 21.37% for the 2012/13 financial year and compared to the projection of 22.4% due to lower OER from the external crop processed. The mill is expected to improve on the process and aiming for higher OER.

The Estates have a Replanting Programme that is projected until 2020 and was revised in January 2014. The replanting will take place in Financial Year 2013/2014 (98ha) and 2014/2015 (201ha) at Kamuning Estate. At Kinta Kellas Estate replanting was stopped for the first half of year 2014 after the annual review. There will be 120ha replanting in 2014/2015 financial year.

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

Elphil Mill and estates operates in accordance with the Sime Darby management systems and standard operating procedures. The practices consistently monitored by mill and plantation advisors and recommendations for improvements are given to maintain the sustainable practices.

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 as a preventive measure to overcome pest attacks have continued with the aim of reducing the use of chemicals.

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

Sime Darby Standard Operating Procedures issued on 2 January 2008 as a standard agricultural reference for all estates. In addition, the Estates have work procedures in local language 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 recently visited on 22 October 2013 to monitor the mill operation. Comments given by the mill adviser was attended by the mill operational team.

The Plantation Advisor visits the Estates twice yearly, with the most recent visit to Kinta Kellas Estate between 20 and 21 September 2013. 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 Research and Development Department conduct annual field inspection of the palms and leaf sampling to monitor palm nutrient status. 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 and due in 2015.

Agronomist visits the estate prior to fertilizer recommendation. Result of the leaf, soil sampling and visual observation used as a guidance to prepare the fertilizer recommendation. Recommendation for the financial year 2013/2014 dated 10 July 2013. Sime Darby Research Centre carried monitoring of fertilizer application. Application records are documented in the daily costing book. Sample checked found that for field number 99A, 99B, and 00A MOP was applied with Muriate of Potash as per recommendation with 1.25kg/palm and application completed in October 2013. Record shows the application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.

About 75 - 80% of EFB is converted to be compost and the balance is applied as mulch to immature palms at the replanted areas. The Estates maintain records of the

quantity of EFB received from the Mill and application records. An average of 40mt/ha is applied.

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

It was noted that Jeranggau and Rengam are the two main soil types at the both estates. Both soil types are mixed with small stones and well drained. The estates continue to establish cover crop consisting of a mixture of *muccuna*, *Pueraria javanica* and *Centrosema muconoides* which are established to prevent soil erosion during the replanting stages. Field inspections confirmed soil conservation practices generally were consistently implemented including silt pits to avoid surface run-off. Kinta Kellas Estate has implemented water conservation furrow in the field to help retain water during the drought period and also to trap any sediments. Planting of vetiver grass to protect slope earth erosion and to avoid sediments from going into waterways is implemented.

Road maintenance programme for FY 2013/14 is available. Example of programme checked at Kamuning estate shows the map indicating road repairs and maintenance for the whole estate roads. The roads repaired are surfaced with crusher-run stone to further improve the road condition and during the field visit it was noted that vast improvement on the road was completed during the last 12 months compared to previous assessment. Other road maintenance operation includes grading, compacting, culvert maintenance, road side silt pit construction and stone application to strengthen the road surface.

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

During the ASA3, both estates assessed has prepared map showing riparian buffer zones and demarcated the areas prior to replanting for all the estates. Field inspection at Kamuning Estate and Kinta Kellas Estate confirmed that the buffer zone beside the stream has been demarcated clearly and maintained. Kinta Kellas Estate has implemented water conservation furrow inside the oil palm planted fields to which has helped the estate to maintain water during the drought period.

Palm Oil Mill monitor water quality of Sg Kerдах upstream and downstream to identify any adverse effect from the mill activities. The laboratory analysis results indicate no significant difference in quality between upstream and downstream locations. Analysis report dated 9/01/2014 (Report No.: IE26/2014) shows all the specifications are within the permitted level of 50ppm and comply with the DOE permit requirement.

The rainfall probability reference manual used as a management tool for water management and the information is used for the scheduling of fertiliser application as well. Daily rainfall is measured at all three

supply base states. The rainfall summary record shows average of 2,332mm (88 rainy days) rainfall received during the 2013/14 financial year until February 2014.

Water usage at mill is monitored daily and summarised monthly before reporting to Head Office. The water usage for the 2012/13 Financial Year was 1.08mt/mt FFB processed and has been reduce to 1.05mt/mt FFB in 2013/14 financial year as to date.

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

Both estates assessed continue to establish planting of the beneficial plants such as *Turnera subulata* and *Cassia cobanensis* along main roadsides, office and housing sites for control of leaf-eating pest. It was noted that the roadsides at the replanted area was already established with beneficial plants as long term preventive measures. There is no serious pest damaged reported at both estates visited.

Both estates have maintained records of six monthly censuses of barn owls as per SOP which indicates records of the blocks where pesticide, such as rat baiting was carried out. Barn owl occupancy census shows that a total of 71 barn owl boxes have been placed with occupancy rate of 55% as at December 2013 at Kinta Kellas Estate while the occupancy rate at Kamuning estate remains at 35%.

**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.**

Sime Darby Central Purchasing Department controls the purchase of pesticides. Inspection of the Pesticide Stores confirmed only pesticides registered by the Pesticides Board were held. Inspection of the Estates Pesticide Stores confirmed storage was in accordance with regulations with adequate security, ventilation, separation of chemicals and spill containment. All chemicals were labelled in Bahasa Malaysia. MSDS's were displayed in the Pesticides Store for each of the chemicals held in both Bahasa Malaysia and English. Sime Darby has developed Pictorial Work Instructions with text in Bahasa Malaysia for chemical mixing and spraying.

Both estates have a programme of conducting annual medical surveillance of all pesticide operators as per CHRA requirement. CHRA was done by assessors Shaari Chin (JKKP IH 127/171-2(124) and T. Norbrilliant

Mokhtar (JKKP IH 127/171-2(257) dated July 2010. Approval to use generic CHRA dated 7 September 2010 with approval number JKKP K/M 127/454/5-16(10) as per USECHH, 2000 is available and approved by the Department of Occupational Safety and Health.

No female pesticide operator. However policy is available and it was confirmed by female general workers that pregnant female workers are not allowed to work with pesticide if found to be pregnant. Those wishes to continue working is transferred to other duties and is not allowed coming back to work as a pesticide operator until she has ceased breast-feeding. Inspection of the pesticide stores and purchase documents confirmed there was no Class 1A or Class 1B chemical bought or held at the Pesticide Stores during this assessment period. Paraquat was eliminated.

Beside annual medical surveillance, quarterly health check for all pesticide operators is carried out by the Hospital Assistant, internally. Annual medical surveillance at Kinta Kellas estate was carried out by a DOSH registered doctor (HQ/08/DOC/649) at Clinic Edina. Kamuning estate medical surveillance was conducted on 30/5/2013 by OHD doctor (Registration HQ/11/DOC/200). The medical check-up reports concluded that all agrochemical operators were medically fit for duty.

However, during interview with the mill laboratory supervisor, it was noted that the annual medical surveillance was not carried out. Therefore, a nonconformity was raised as per below.

**NC Ref: 1028800M0: Major nonconformity against indicator 4.6.5: Annual medical surveillance as per CHRA.** At Elphil Mill, during the interview with the laboratory supervisor and employees on 18/3/2014, it was noted that the annual medical surveillance was not conducted. Document check did not found any annual medical surveillance reports. Last medical surveillance was conducted in November 2012. This was confirmed by the on-site quality assurance staff. – refer section 3.2 for details.

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

Sime Darby's OHS Policy signed by the top management provides guidance for all OSH related matters. This policy communicated to all employees onsite during safety meeting and morning briefing.

The annual review of the HIRARC was carried out by safety officer onsite and compliance officers. Last review was done on December 2013. Mill and estate have individual training program to address all the safety requirement and work procedures. Safety awareness is ongoing all the time through morning briefing which includes safety at work and records are maintained.



Visit to the mill and estates field reveal that good awareness of safety is practiced. All operating units supply appropriate PPE that suits individual work requirement. It is also noted that PPE use is implemented and monitored through worksite inspection.

The Assistant Manager is the person responsible for any OSH issues and communicates and updates the managers accordingly. OSH meetings are conducted quarterly. Meeting minutes dated 11 February 2014 was checked and found that there are no any pending issues. Meeting was attended by representative from all categories of workers. Matters related to safety and health discussed including conduction worksite inspection.

The mill has emergency evacuation plan complete with emergency contact details, organization chart, responsibility and training was conducted to communicate the plan. The OSH training includes firefighting training by Fire Department, first aid training by St. John Ambulance, internal safe driving training etc. Recent internal safety and health audit was conducted by ESH Manger from PSQM on 27 January 2014 and compliance was reported.

Inspection reveals that first aid kits are available at work site. Interview reveals that first aiders are train to handle any emergency situations. Accident reports are sent to DOSH as per requirement on 12 January 2014 for the period covering 2013. Accident records are documented if there are any accidents. There is no fatal accident but minor common injuries are noted. Local workers are covered by Socso and foreign workers are covered by RHB accident insurance (Policy No.: FW054297) valid till 15/01/2015.

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

The Mill and Estates have prepared an annual training plan for 2013/14 that details the training to be carried out for each work station. In addition, the Mill carries out informal on-the-job instruction to improve skill levels. The Mill and Estates maintain records of training for workers and staff.

Example of training conducted as follows:

First Aid Training on 7/2/2014 conducted by the Malaysian Civil Defence Department (Jabatan Pertahanan Awam). Harvesting Training was conducted on 2/11/2013, Fire Fighting Training was conducted on 28/5/2013 by Fire and Rescue Department from Batu Gajah, Perak. Agrochemical Spraying Training was conducted on 16/4/2013 by MyCrop external spraying equipment supplier. Driver's competency training was conducted on 14-15/3/2014 by Metro Driving Academy; Schedule Waste Handling Training was conducted on 11/9/2013 by PSQM – ESH trainer.

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

Elphil mill and supply base estates continue to ensure that environmental improvements are implemented consistently towards the reduction of waste, such as oil losses at the Mill and the efficient use of natural resources such as water. Riparian buffer are being reinstated during replanting and the company continued to make employees aware of the need to protect biodiversity areas. Inspection at Kinta Kellas and Kamuning Estates shows the riparian area has been demarcated and managed well.

**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 palm oil mill and supply base has carried out the annual review of environmental impacts in term of Environmental Aspect and Impact Identification and Management Action Plans were developed. Continuous Improvement Plans for environmental impacts includes pollution control, waste management and continuous monitoring. Latest review was conducted by the management on 15 July 2013. Since there is no changes in the operation, the aspect impact identification and plans remains similar to last assessment with improvement plans for the adverse impacts.

**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.**

As reported during last assessment, estate lands were cleared during the original land development in the early 1920s and remnant vegetation is limited to small areas of steep limestone hills. Conservation areas which were assigned to remnant vegetation and riparian buffer zones are continuously maintained. Staff and workers were given briefing on company policies that prohibit disturbance of designated protected areas. Signages are maintained at the entrance to the estates prohibiting illegal hunting, fishing and the use of fire. Posters are displayed on the notice boards at muster areas.

The respective staff and auxiliary police ensure that the conservation areas are not encroached and damaged. Records are made in the daily patrolling book.

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

Scheduled waste stores and stored materials well managed with appropriate label, segregation and the inventory is up-to-date. Authorised and licensed schedule waste collector engaged to dispose the schedule waste. For example, mill has send schedule waste through consignment Note: 0049953 dated 28/2/2014 for Spent Hydraulic oil, Electrical waste and chemical container. As for Kinta Kellas estate, last disposal was on 7/3/2014 through G-Planter.

The Kinta Kellas Estates have developed landfills for disposal of non-recyclables domestic waste. The landfill site is also fenced to ensure security. Kamuning Estate waste collection is carried out by the Sungai Siput Municipal Council and disposed at the government landfill. Line sites visited shows household waste is properly managed. Treated effluent is applied to the palms in furrows within Elphil Estate which is close to the mill and EFB have been applied in the fields at 40mt/ha on the flat area as per recommendation from the Research and Development Department.

However, during visit to the Kinta Kellas Estate diesel storage area, spillages were noted and a nonconformity was raised as per below.

**NC Ref: 1028800N1: Minor nonconformity against indicator 5.3.2: Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution.** At Kinta Kellas Estate, Pollution prevention plan has been developed. However, during the visit to the diesel storage tank on 19/3/2014, diesel spillage was found at the filling area ground and inside the monsoon drain beside the storage area. – refer section 3.2 for details.

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

Similar to the last assessment, the mill continue to report total renewable energy generated on monthly basis to Head Office. An average renewable energy generated from shell and fibre for the year 2013 was 0.88kWh. There is a reduction in the use of fossil fuel. 0.25lts/Mt FFB processed was used compared with 0.38lts/mt FFB previously. The use of renewable energy has been maximised.

**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.**

All operating units avoid using fire for waste disposal as per company policy on zero burning. Recently replanted areas confirmed palms were felled, chipped and windrowed. This was noted during the field visit to the replanted area. No evidence of fire used for domestic waste found during the visit to the line site at all the operating units.

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

Pollution prevention plan has been updated on 10 February 2014. Protecting slope earth erosion and to avoid sediments from going into waterways is continuously given priority. Mill has improved the storage area for fibre and ash to avoid any leaching. The mill is consistently controlled water usage for processing to ensure waste water is reduced and the treatment ensures that the BOD is within 50ppm. Analysis report dated 9/01/2014 (Report No.: IE26/2014) shows all the specifications are within the permitted level of 50ppm and comply with the DOE permit requirement. The biogas feasibility study is still ongoing but no decision was made.

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

The palm oil mill and all estates are continuously maintaining good relationship with internal and external stakeholders. During the ASA3 it was noted that neither complaints nor disputes was raised by internal and external stakeholders. Equal opportunity policy and equal treatment of male and female employees are well implemented. Interview with male and female workers reveal that there is no any form of discrimination. Freedom to join workers union of their choice is implemented. The company makes contributions to local stakeholders such as mosque, temple, schools and local community activities.

**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.**

Mill SIA management action plan has been updated on 18 February 2014. As for Kinta Kellas estate, the SIA management plan has been revised on the 15 July 2013. It includes upgrading of facilities and subsidy for school children transport. Similarly Kamuning estate updated the SIA plan in 8 July 2013. There were no any significant negative impacts were noted.

**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.**

Communication with local communities and other effected parties are carried out through meetings and informal gatherings at worshipping places. Stakeholder list is available and updated. This list includes local community leaders, representatives, suppliers, contractors, government departments and contacts

details. Interview with stakeholders confirm that there are regular meetings were conducted. Last meeting was held on 20 January 2014 which involved local land department and religious department. Another meeting was held on 6/3/2014, attended by 9 stakeholders.

**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.**

Complain procedure available and similar to the initial assessment procedure. No formal complaints noted. Most of the communication records shows request for assistance such as request for permission to use community hall. These records are written and maintained by all operating units.

**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.**

No any kind of disputes noted during this assessment. Stakeholder interview and meeting did not highlight any disputes as well as any customary rights issue.

**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.**

Workers contract and payment follow the MAPA/NUPW Agreement and Minimum Wage Order. Payslip and contract of mill workers and plantation workers are as per the contract signed by them and follow the NUPW and MAPA agreement. All the workers earn more than minimum wage of RM 900. Inspection on (Employees No.: 000086786 and 000027671) for the month of January 2014 and February 2014 shows that pay is RM 950.00 and RM1,128 respectively which is more than the minimum wage of RM 900.00 set by the government. The contract agreement clearly stated that is in accordance with the MAPA / NUPW provisions. Interviews of staff and workers confirmed that they understood the terms and conditions of their contract of employment and received benefits accordingly.

The company provides a good standard of housing for its staff and workers and their families. Other facilities such as worship place, playground and community hall have been provided. For example, a new mosque is completed at Elphil Estate. 20 units of new housing were completed at Kamuning estate and Kinta Kellas estate.

Primary School is located approximately 1.5km distance and Secondary School at Sg Siput, approximately 8 km distance. Electricity and Water are supplied to Mill and Estates housing from the Government supply and piped

directly to each house at mill housing, Elphil and Kinta Kellas Estate. Kamuning Estate is using own water source from nearby mountain spring water. There is capital expenditure budgeted to get the government water supply in 2014/2015 financial year.

**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.**

Latest workers Union meeting in Mill was conducted on the 13 March 2013 attended by 10 representatives. The next meeting has been planned on 2 April 2014. Interview with the union representative confirm that there were regular meetings conducted and they are free to join the union. As for Kamuning estate, the latest union meeting was conducted on the 24 February 2014 attended by 8 representatives.

**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.**

The minimum working age is 18 under the Malaysian Labour Ordinance 1969. At time of hire age is checked by examination of identification 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 Estate operational areas during the field visit. Document verification further confirms that the minimum age requirement for employment is met.

**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 pay record and contract of employees (local and foreign workers) together with interviews at the Mill and Estates did not identify any issues related to discrimination. Further interview with staff and external stakeholder confirm that there is no issue of discrimination. All workers and staff consulted did not highlight any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age.

**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 in April 2008. Similar to the last assessment, interview of female Staff and Workers confirmed their knowledge of the Policy and as advised there were no outstanding issues.

All the operating units continue to use the Manual on Gender Policy implementation partnership with Tenaganita developed in June 2010 is used as guidance for implementation. Latest gender committee meeting was conducted on the 12 February 2014 together for Elphil mill and estate attended by 19 members. As for Kinta Kellas Estate, latest meeting was on 19 February 2014. Social activities are continuously organised and committee is also continue to raise fund for social activities.

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

Interview with FFB Transport contractor (AMUSU Management Sdn. Bhd), general equipment supplier and the FFB trader confirmed that the contract terms are understood before the signing of the contract. All the payments are made on time. No disputes noted. The FFB price follows the MPOB price structure which is published in the local papers and MPOB website.

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

Infrastructure surrounding Elphil Certification Unit and Supply Base are well developed with nearest town of Sungai Siput. Government facility and services are available for all employees and everyone have access to these facilities. Elphil mill and estates contribute to local development through donations to local schools, temples and mosques, which are considered an appropriate form of assistance. More than RM 4500.00 has been donated for variety of social events for the year 2013 by the mill and supply base estates.

**Principle 7: Responsible Development of New Plantings**

Supply base under Elphil certification unit 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. Immature area was replanted area.

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

All operating units committed to continuously improve the efficiency of its performance as a grower and producer of palm oil. Budget for continuous improvement of houses is in place for the next 5 years. Replacement of old pipeline is completed at Elphil estate.

**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.**

The Mill has continued to look for ways to increase processing efficiency to improve the oil extraction. Reducing water usage as part of water conservation commitment.. Similar to last assessment, recycling efforts are carried out wherever possible.

The company has an approved additional budget for construction of new houses and upgrading current workers housing at Kamuning estate.

All the operating units are continuously ensuring the reduction in the quantity of water used through regular inspection and repair of leaks. This indirectly reduces the wastage and helps in water conservation.

Progressive reinstatement of buffer zones during the replanting is a continuous effort by all the estates. Kinta Kellas estate is improving the bund section for the diesel storage area as part of the continuous commitment and improvement to ensure and prevent polluting activities.

Improvement of herbicide spraying techniques through training by external trainers are conducted to ensure and reduce herbicide usage and to avoid spraying of non-target weeds. Calibration is carried out by external personnel and R&D personnel to ensure wastage.

**3.2 Identified Nonconformities and Noteworthy Positive and Negative Observations (ASA3)**

There was a nonconformity assigned to Major Compliance Indicator 4.6.5 and Minor Compliance Indicator 5.3.2 and an observation for Improvement were identified. The details as follows:

**Major Nonconformity:**

**NC Ref: 1028800M0**

**4.6.5 Annual medical surveillance as per CHRA.**

Elphil Palm Oil Mill: No annual medical surveillance conducted for employees at the mill laboratory. During the interview with the laboratory supervisor and employees on 18/3/2014, it was noted that the annual medical surveillance was not conducted. Document check did not found any annual medical surveillance reports. Last medical surveillance was conducted in November 2012. This is also was confirmed by the on-site quality assurance staff.

Corrective Action Plan and implementation:

Elphil Palm Oil Mill found that that cause of the delay is due to miscalculation of the surveillance period. Immediate action was taken by the mill by sending the laboratory employees for medical surveillance at clinic Tweedie on 19 March 2014. The Elphil mill also prepared a Corrective Action Plan for addressing the identified nonconformity to prevent similar cases. The corrective



action was verified by the audit team and accepted. The corrective action as follows:

The Quality Assurance Officer and Quality Management Officer at the mill assigned to monitor the medical surveillance durations and validity. Immediately send the laboratory employees for the medical surveillance. To submit the medical surveillance report to the audit team.

The medical surveillance result dated 20 March 2014 was submitted to the audit team on 21 March 2014. The report was checked and verified on-site after the closing meeting. The medical surveillance was conducted by OHD doctor (registration number: HQ/11/DOC/00(200)). The report number was HQ14-0137350 reveal that all employees are medically fit to continue work. With the evidence of implementation, the nonconformity was closed on 2 April 2014.

**Minor Nonconformity:**

**NC Ref: 1028800N1:**

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

Kinta Kellas Estate: Implementation of pollution prevention plan at the diesel storage area is not effective. Pollution prevention plan has been developed. However, during the visit to the diesel storage tank on 19/3/2014, diesel spillage was found at the filling area ground and inside the monsoon drain beside the storage area.

**Corrective Action Plan:**

Kinta Kellas Estate is in the midst of upgrading the diesel storage area at the moment. There was some delay in completion. The management prepared a Corrective Action Plan for addressing the identified minor nonconformity. The corrective action was verified by the audit team and accepted. The corrective action as follows:

The management will ensure that the improvement work is completed by June 2014. The Assistant Manager to monitor the diesel storage areas regularly and ensure spill kit is used. The implementation of the corrective action plan for this minor nonconformity will be followed up during the next annual surveillance assessment.

**Observations/Opportunities for Improvement (ASA3)**

An observation/Opportunity for Improvement was identified. The progress with these will be checked during the next Annual Surveillance Assessment.

Observation 1: 4.3.3 Kamuning Estate: During the document audit it was noted that road maintenance program available and covers all aspects of road maintenance. Roads are maintained well. Progress of the completion is recorded and mapped. There were some delays in updating the map after completion of work.

**Noteworthy Positive Components**

- Elphil palm Oil Mill has been awarded 5S Certificate (Certificate No. AC3337) certified for Quality Environment Management system by Malaysia Productivity Corporation.
- Kamuning Estate has been certified for Code Of Good Nursery Practice by Malaysian Palm Oil Board (Certificate No. MPOB-CoP/NN/0163).
- Kinta Kellas Estate has implemented water conservation furrow inside the oil palm planted fields to which has helped the estate to maintain water during the drought period.
- Kamuning Estate has further improved the road condition in the field with re-surfacing with gravel. Kinta Kellas Estate completed tarmac road at the housing site.

**3.3. Status of Nonconformities (Major and Minor) Previously Identified**

Corrective Actions for nonconformity identified during the ASA2 was effectively and consistently implemented and the nonconformity remains closed.

**NC Ref: 911210N0:**

**6.11.1 Demonstrable contributions to local development that are based on the results of consultation with local communities.**

During the stakeholder consultation, the village head at Kinta Kellas Estate highlighted that the village road used by the estate vehicle was not repaired despite writing letter to the estate management. It was recorded in the estate's consultation with the village head. However, the repair was not done. There is no sufficient evidence that the estate has made contribution to local community as per the result of consultation with local community.

**ASA3 Finding:** Kinta Kellas Estate has implemented the Corrective Action Plan for addressing the identified nonconformity effectively and was verified during the ASA3. As agreed between Head of Village (Ketua Kampung Sri Jaya) and Kinta Kellas Estate (Estate Manager/Asst Manager) during Meeting, 9th April 2013, Estate carried out the repair of the road as part of CSR program. The Head of the village sent a letter to the management thanking the management for the assistance given. Interview with the Head of the village during the ASA3 further confirm that he is satisfied with the condition of the road. Estate also conducted 6 monthly meeting with local Village's Head to build up good relationship with the local community and to identify any other issues that need improvement. With the evidence of implementation, the nonconformity was closed on 19 March 2014.

### **Review of Progress with Observations/ Opportunities for Improvement Previously Identified**

1. 2.1.2: *Elphil Estate and Kinta Kellas: It was noted that the renewal of the diesel permit is in progress of approval. The management should ensure that this process is completed. At the Elphil estate the application for expansion of the diesel storage on 19 Dec 2012 should be followed up to ensure the permit is obtained before using the new tank.*

**ASA3 Finding:** The diesel permit was renewed and valid until 8/1/2015

2. 4.7.1: *The Elphil mill should follow up on the Fire Certificate applied on 9/4/2013.*

**ASA3 Finding:** Elphil mill obtained Fire Certificate on 25/09/2013 (Certificate # JBPM: PK/7/3/2013)

3. 4.7.1(b): *The CEMS at the Elphil Mill was struck by lightning and was recorded in the DOSH log book on 18/7/2012. Service was done by contractor. It was noted that CEMS was struck by lightning again. It will be to the benefit of the mill to analyse the root cause of this repeating incidents for future improvement.*

**ASA3 Finding:** The CEMS has been rectified and functioning.

4. 4.7.1(i): *All operating units: It will be to the benefit of the operating units to ensure that there is sufficient stock of PPE at all the time.*

**ASA3 Finding:** During the ASA3 it was noted that all the operating units have sufficient PPE stock.

5. 5.6.2: *Kamuning estate was budgeted to build a new oil trap at the workshop as a result of internal pollution prevention plan review. The progress should be completed as per the budget.*

**ASA3 Finding:** The construction of the oil trap is completed and was verified.

### **3.4 Issues Raised By Stakeholders (ASA 3)**

Stakeholders interviewed, both internal and external, had mainly positive comments. The details of stakeholders comment are follows:

**Mosque Committee (kamuning Estate):** During the ASA3 follow up on the previous comments on the Mosque within the estate land managed by the nearby town community was followed up. The mosque committee highlighted that they are satisfied with the process of discussion with Sime Darby, District Officer, District Land Department, State Islamic Religious Department, managers and Mosque committee. The recent meeting was held on 20 January 2014. The estate manager is aware of this latest development.. It was noted that there is a process of continuous consultation and resolution process which accepted by both parties. The

progress will be followed up during the next surveillance.

**Company Response:** Sime Darby Land Department is in the process of discussion with relevant Government Departments to resolve this matter through State Islamic Religious Department.

**Audit Team Finding:** There is an agreed process and interview with both parties reveal that the process is accepted by all parties involved.

**Fire and Rescue Department:** Confirmed that fire drill was conducted. It was highlighted that the mill was presented with Fire Certificate.

**Company Response:** The management always co-operate with Fire and Rescue Department in organising fire drills.

**Audit Team Finding:** Positive comments.

**The Head of Village (nearby Kinta Kellas Estate):** No any pending issues. The relationship between estate management and village community is good. The previous issue on road upkeep was resolved promptly and now estate carries out regular upkeep of the road.

**Company Response:** The manager said that the management always keep regular communication with the village community.

**Audit Team Finding:** Positive comments. Previous issue was resolved.

**Police Department Representative:** No illegal workers issue. Police have not received any reports on theft and social problem issues from the estate of the nearby village community. The management have always communicated about activities held in the estate.

**Company Response:** The management will continue to keep the police department informed on any issue relevant to safety.

**Audit Team Finding:** Positive comments.

**Contractor:** No any issues highlighted. Payment is prompt. Understand the term of contract.

**Audit Team Finding:** No issues.

**Union Representative and workers representative:** No any pending labour issue.

**Audit Team Finding:** No issues.

**Labour Department:** No any pending issues related to pay and condition and facilities. Recently receive complaint on water cleanliness but investigation

revealed that the compliant was not true. Meeting held with the management on 3/10/2013.

**Company response:** The management is always committed to provide the best facility and pay to workers to retain them.

**Audit Team Finding:** Interview with workers and visit to the housing site reveal that there is no complaints regarding water quality. Water was checked at housing site and found to be clean. No further issues.

**Health Department:** No issues.

**School Assistant Head Master:** The estate management continue to assist the school whenever request for assistance is submitted to management. There are no children working in the estate.

**Company response:** The assistance is given whenever there is a request and within the authority of the manager. Otherwise the request is forwarded to the head office for decision. The management also take part in the school activities whenever invited.

**Audit Team Finding:** No further issues.

#### **Issues Raised by Stakeholders previously (ASA 2)**

The issues raised during the ASA 2 and company's responds were verified during this assessment. The details are as below:

1. **Fire and Rescue Department:** Suggested that the estate should consider a fire drill to address any fire in the field. Second suggestion was to have a fire hydrant at the housing site.

**ASA3 Finding:** The management have conducted the fire drill involving the Fire and Rescue Department. Water tanks were used and members of the fire fighting team involve in the drill on 21/02/2014. As for the second suggestion, it was not possible at the moment because the water pressure is insufficient. This was confirmed by the fire department officer. The issue was addressed.

2. **Mosque Committee (kamuning Estate):** The mosques committee requested for extra land adjacent to the mosque.

**ASA3 Finding:** Refer to section 3.4 item 1. The issue is in progress and agreed by all parties.

3. **The head of village:** Complaint that the road at the village is being used by the estate and estate agreed to repair the road. However, he informed that the road was not repaired as agreed for more than a year. He also said that he wrote a letter to the estate management about

this issue. **(This is raised as a NC Ref: 911210N0)**. This will be followed up during ASA3.

**ASA3 Finding:** The road was repaired and during the ASA3 the same road was visited and found to be in good condition. The Head of Village was interviewed and he confirmed that regular upkeep of the road is carried out by the estate. He also wrote letter to the Kinta Kellas Estate Manager thanking him for his regular help in up keeping the road. The issue was resolved.

4. **VMO (Kinta Kellas)** highlighted that the medicine stock is insufficient and no "Ubat Cacing" and nebulizer.

**ASA3 Finding:** The manager has addressed the issue. Visit to the clinic confirms that there is sufficient medicine. This was inspected during the visit to clinic and further confirmed by the Hospital Assistant during interview. The issue was resolved.

**The village representative for the Indian Settlers at Kamiri Division (Elphil Estate):** The representative confirms that the process of negotiation to provide them with the alternative area to move is being addressed by the government to move them to Sg. Nyamuk Village. This is accepted by the encroached settlers. This is expected to be completed by 2015 under "Rancangan Perkampungan Tersusun" from the government.

**ASA3 Finding:** The management had meeting with District Officer and District Land Department in the present of Sime Darby Land Management Department and representative from the village on 17 December 2013. The management will follow up with Sime Darby Land Department to resolve this issue accordingly. There is an agreed process in the present of representatives from the government. Interview with village representative reveal that the process is accepted.

**Workers representative (Kinta Kellas):** Suggested that the estate should provide a simplified vest rather than the present vest which is uncomfortable to wear during harvesting.

**ASA3 Findings:** The management have provided simplified vest. The issue was resolved.

#### **4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

##### **4.1 Date of Next annual surveillance Visit**

The next Surveillance Assessment (ASA4) will be scheduled within twelve months of RSPO Certificate anniversary.


**4.2 Date of Closing Nonconformities (Major and Minor)**

CAR Ref.	CLASS	ISSUED	STATUS
CRO1	Minor	12/03/2011	Closed on 12/04/2012
CRO2	Minor Major	12/03/2011 Upgraded 12/04/2012	Closed on 29/05/2012
CRO3	Minor	12/04/2012	Closed on 11/04/2103
911210N0:	Minor	12/4/2013	Closed 19/03/2014
1028800M0	Major	18/3/2014	Closed 02/04/2014
1028800N1	Minor	19/3/2014	"Open"

**4.3 Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings**


Elphil Certification Unit acknowledges and confirms acceptance of the Assessment Report contents, including assessment findings. Elphil Certification Unit 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

  
SIME DARBY PLANTATION SDN. BHD.  
(Company No. 647766-V)  
KILANGAN SIAI PALM OIL MILL ELPHIL  
Manager, Elphil Palm Oil Mill  
.....  
AZMAN TAKAH  
Pengurus

.....  
Manager, Elphil Palm Oil Mill  
2/05/2014

Signed for on behalf of BSI  
Group Singapore Pte Ltd

  
Senniah Appalasamy  
BSI RSP0 Lead Auditor  
21/04/2014



## Appendix A: Sime Darby Plantation Time bound Plan

<b>certification Status</b>	<b>Malaysia</b>	<b>Indonesia</b>	<b>Status during ASA03</b>
Certified as of March 2014	34 Certification units	21 Certification units	Total Certified: 55
Undergoing Certification Process	-	4 Certification Unit	Certification on-going: 4
RSPO EB Review	-	-	-
<b>Total</b>	<b>34 Certification units</b>	<b>25 Certification units</b>	<b>59 Certification units</b>

## Appendix B: Sime Darby Plantation Sdn Bhd – SOU 3 Elphil Palm Oil Mill Certification Unit RSPO Certificate Details

Sime Darby Plantation Sdn. Bhd.  
 SOU 3 Management Unit (Elphil Palm Oil Mill)  
 Kilang Kelapa Sawit Elphil,  
 31100 Sungai Siput (U),  
 Perak,  
 MALAYSIA

BSI RSPO Certificate No: SPO 550180

Date of Initial Certificate Issued: 18 June 2011

Date of Expiry: 17 June 2016

Applicable Standards: RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; RSPO P&C MY-NIWG 2010; and relevant element of Supply Chain requirements for CPO Mills; SCCS Standard Nov 2011 Module E: Mass Balance.

<b>Elphil Palm Oil Mill and Supply Base</b>		
<b>Location</b>	District of Sungai Siput, Perak, Malaysia.	
<b>Address</b>	SOU 3 Management Unit (Elphil Palm Oil Mill), Kilang Kelapa Sawit Elphil, 31100 Sungai Siput (U), Perak, MALAYSIA	
<b>GPS</b>	101° 5' 37" E; 4° 53' 24"N	
<b>CPO Tonnage Total Production</b>	39,091	
<b>CPO Tonnage Total Production (Certified)*</b>	30,515	
<b>PK Tonnage Total Production</b>	9,827	
<b>PK Tonnage Total Production(Certified)*</b>	7,671	
<b>Company Estate FFB Tonnage (Certified) *</b>	142,328	
<b>Estates FFB Tonnage (Certified)*</b>	Elphil Estate	41,988
	Kamuning Estate	79,122
	Kinta Kellas Estate	21,218
<b>Non Certified FFB tonnage (Excluded from Certificate)</b>	40,000	

\* Certified production

## Appendix C: Assessment Programme

Date	Time	Subjects	Senniah	Muhd Haris
Monday 17/3/2014	15.00 – 17.00	Meeting External Stakeholder.	√	√
Tuesday 18/3/2014 <b>Elphil Palm Oil Mill</b>	08.00 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Presentation by the Estate and mill managers</li> <li>• Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> </ul>	√	√
	09.00 – 12.00	<b>Elphil Palm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management, Effluent Ponds, OSH, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection.	√	√
	12.00 – 13.00	Lunch	√	√
	13.00 – 17.00	<b>Elphil Palm Oil Mill:</b> Document Audit, SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, permits, mill inspection records, etc.	√	√
Wednesday 19/3/2014	08.00 – 12.00	<b>Kinta Kellas Estate</b> Field visit, boundary inspection, fertiliser application, field spraying, harvesting, workers interview, buffer zone, HCV area, replanting area etc. Verify ASA 1 corrective action plans and implementation for the findings and observations.	√	-
	08.00 – 10.30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√
	10.30 – 12.00	Office, workshop, worker housing, clinic, Landfill, Chemical store and mixing, etc. And Document Audit.	-	√
	12.00 – 13.00	Lunch	√	√
	13.00 – 17.00	<b>Kinta Kellas Estate</b> Document review (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification, review pay documents etc).	√	√
Thursday 20/3/2014	8.00 – 12.00	<b>Kamuning Estate</b> Field visit, boundary inspection, fertiliser application, field spraying, harvesting, workers interview, buffer zone, HCV area, Office, workshop, worker housing, clinic, Landfill, Chemical store and mixing, etc. And Document Audit.	√	√
	12.00 – 13.00	Lunch	√	√
	13.00 – 17.00	<b>Kamuning Estate</b> Document review (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification, review pay documents etc).	√	√
Friday 21/3/2014	8.00 – 12.30	Continue supply chain document audit at mill and verify outstanding issues.	√	√
	12.30 – 14.00	Lunch and Friday Prayers	√	√
	14.00 – 15.30	Auditor meeting & Preparation for closing meeting	√	√
	15.30 – 16.30	Closing Meeting	√	√

## Appendix D: List of Stakeholders Contacted

<p>Internal Stakeholders</p> <p>Managers and Assistants</p> <p>Male Mill Staff/Workers</p> <p>Female Mill Staff/Workers</p> <p>Foreign Worker</p> <p>Male and Female Estate workers</p> <p>Hospital Assistant</p> <p>Female Assistant at Clinic</p> <p>Union Representatives</p> <p>Gender Committee Secretary</p>	<p>External Stakeholders</p> <p>Head of the Village</p> <p>Mosque Committee</p> <p>Join Consultative Committee at village</p> <p>Indian Settlers Representative</p> <p>NUPW Representative</p> <p>AMESU Representative</p>
<p>Contractors &amp; Consultants</p> <p>Electrical Contractor</p> <p>General Supplier</p> <p>FFB trader</p>	
<p>Government Departments</p> <p>School</p> <p>Police Department</p> <p>Labour Department</p> <p>Fire and Rescue Department</p>	



## Appendix E: Elphil Palm Oil Mill Supply Chain Assessment (Module E: Mass Balance)

Requirements	
<b>E.1. Documented procedures</b>	
E.1.1 The facility shall have written procedures and/or work instructions to ensure implementation of all the elements specified for Mass Balance (MB) supply chain requirements.	Elphil palm oil mill have written documented procedures ( <i>SPMS: 2012 Appendix 15- Standard Operating Procedure for Traceability and RSPO Supply Chain Certification System</i> ) for the chain of custody with MB model covering certified and non certified FFB. The mill manager has the responsibility to ensure implementation. The MB model used because there are non-certified FFB purchased from traders.
E.1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.	Elphil mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). Documented procedures ( <i>SPMS: 2012 Appendix 15- Standard Operating Procedure for Traceability and RSPO Supply Chain Certification System</i> ). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received.
<b>E.2. Purchasing and goods in</b>	
E.2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non certified FFB. Records verified by internal and external audit.
E.2.2 The facility shall inform the CB immediately if there is a projected overproduction.	The facilities aware of this procedure.
<b>E.3. Record keeping</b>	
E.3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of certified and noncertified palm products.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non certified FFB. Records verified by internal and external audit. Sample checked dated 10/3/2014, weighbridge ticket number: 48861, consignment note number: 31883 contains details of supplier, transport details and volume.
E.3.2 Retention times for all records and reports shall be at least five (5) years	The retention period is specified as five years and financial documents retained longer based on the local regulation requirement. This is also included in the documented procedures ( <i>SPMS: 2012 Appendix 15- Standard Operating Procedure for Traceability and RSPO Supply Chain Certification System</i> ).
E.3.3 (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.	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. No PKO and Palm kernel meal at these sites. PK is sold to Sime Darby's subsidiary kernel crushing plant through Sime Futures Trading.
E.3.3 (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.	Computerized system in place with the delivery deducted accordingly through computerized accounting system. The detail is also included in the daily, monthly and quarterly crop reports.
E.3.3 (c) The facility can only deliver Mass Balance sales from a positive stock. However, a facility is allowed to sell short.	Only positive stock id delivered. No short selling recorded.
E.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.	Facilities use Mass Balance model and indicated on the relevant sample documents as RSPO CPO/MB whenever certified palm product to be sold.
E.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.	No outsourcing activities.
<b>E.4. Sales and goods out</b>	
E.4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information	There are no sales through eTrace. The mill is ready to carry out sales of certified palm products through eTrace. Existing system is ready to cater for future sustainable palm product sales. Sample of existing sales invoices and documents were checked and found that:
(a) The name and address of the buyer	Name and address of buyer written on the invoice of the existing documents. Sample checked was conventional palm oil send to Sime Futures Trading on 10/03/2014.
(b) The date on which the invoice was issued	Date is written as 10/03/2014.
(c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)	Product description and supply chain model is written. Mass Balance model.
(d) The quantity of the products delivered	Quantity in tones (30.68mt).
(e) Reference to related transport documentation	Weighbridge documents and D/O includes all the transport references. i.e. lorry number WAW 660.

<b>E.5. Training</b>	
E.5.1 The facility shall provide the training for all staff as required implementing the requirements of the Supply Chain Certification Systems.	Staffs in the weighbridge, inventory, storage and processing, document control have attended latest training on 20 January 2014.
<b>E.6. Claims</b>	
E.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.	No claims made because the CPO is delivered/sold to downstream refineries.

**Actual Certified Palm Production - 01 April 2013 - 31 March 2014 (ASA2)**

MILL	CAPACITY	CPO	PK
Elphil Palm Oil Mill	45 mt/hr	24,623	6,967

**Actual Sales of Certified Palm Products - 01 April 2013 - 31 March 2014 (ASA2)**

MILL	Certified CPO Sales	Certified PK Sales	Remarks
Elphil Palm Oil Mill	NIL	NIL	No sales of certified palm products through eTrace system. Palm products are sold as normal palm products because buyers want only normal conventional palm products.

**Actual Certified FFB Received Monthly - 01 April 2013 - 31 March 2014**

Month	Elphil	Kamuning	Kinta Kellas	Total FFB/Month
April 2013	2,662	4,201	1,167	8,030
May 2013	2,553	3,933	1,037	7,523
June 2013	2,630	4,956	1,257	8,843
July 2013	3,638	6,322	1,756	11,716
August 2013	3,442	6,,414	2,036	11,892
Sept. 2013	3,588	7,024	1,895	12,507
Oct. 2013	4,003	6,605	1,896	12,504
Nov. 2013	3,223	6,148	1,565	10,936
Dec. 2013	2,945	5,367	1,477	9,789
January 2014	3,252	4,226	1,395	8,873
February 2014	2,562	3,876	1,261	7,699
March 2014	1,822	2,392	698	4,912
<b>Total</b>	<b>36,320</b>	<b>61,464</b>	<b>17,440</b>	<b>115,224</b>