

## **RSPO – 3<sup>rd</sup> ANNUAL SURVEILLANCE AUDIT**

### **POLIAMBA LTD**

**NEW IRELAND PROVINCE, PAPUA NEW GUINEA (PNG)** 

Report prepared by Lead Auditor: Haeruddin PT. BSI Group Indonesia



TABLE OF CONTENTS P				
Section 1	Scope of the certification Assessment  1.1 Company Detail  1.2 Certification Information  1.3 Location(s) of Mill and Supply Bases  1.4 Description of Supply Base  1.5 Planting and Cycle  1.6 Certified Tonnages	3 3 4 9 9		
Section 2	Assessment Process	10 10 10 11		
Section 3	Assessment Finding 3.1 Detail of Audit Result 3.2 Progress Againts Time Bound Plan 3.3 Detail of Finding 3.3.1. Review of Previous Assessment Finding 3.3.2 NC and observation was raised during this surveillance audit. 3.4 Positive Finding 3.5 Issues Raised by Stakeholders 3.6 Status of Non Conformities	12 12 58 59 59 61 61 62 62		
Section 4	Acknowledgemnt of Assessment Finding	62		
Appendix A Appendix B Appendix C Appendix D	RSPO Certificate Detail	63 64 66 68		



### **Section 1 Scope of the Certification Assessment**

1.1. Company Details					
RSPO Membership Number	1-0016-04-000-00	Date	30 <sup>th</sup> November 2004		
_	(New Britain Palm Oil Limited)				
Company Name	Poliamba Ltd				
Address	Office:				
	PO. Box. 46, Kavieng, New Ireland	Province, Pa	pua New Guinea.		
	Site:				
	Lakurumau, Kavieng District, New	Ireland Provir	nce, Papua New Guinea (PNG)		
Subsidiary of (if applicable)	-				
Contact Name	Ms. Katrina Durham (Sustainability Manager)				
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1.2. Certification Inform	
<b>Certificate Number</b>	SPO 573539 <b>Date</b> 19 <sup>th</sup> March 2012
Scope of Certification	Poliamba Palm Oil Mill with 5 estates as supply base (Kara estate, West Coast estate, Nalik estate, Notsai estate, Madak estate) and Smallholders Group.  Poliamba Mill capacity is 30 tonnes FFB/hour.
	Inclusion of Smallholders The company is working with the Smallholder representative in the use of the "Planting Approval Form" which is used as a mechanism to access the blocks of smallholders on current setting in relation to block conditions as well as environmental screening. It is also the mechanism used to review the SG applications for development of new areas of land to oil palm. The PNG NIWG submitted the "Planting Approval Form" along with the NI to the RSPO, EB and the public review process.
	Since late 2007, no new Small holders have been accepted without being subjected to a field assessment in accordance with the "Planting Approval Form".
	Smallholders
	The PNG NIWG had previously established the status of the smallholder growers as "independent" under guidelines previously set. Smallholders are not under any obligation or contract to supply to the mill but are associated to the Company through geography and logistics. The Government national extension service, the PNG Oil Palm Industry Corporation (OPIC) is present in New Ireland Province. The company therefore included smallholders in the company wide awareness programs, compliance surveys and other RSPO related work. The company has a defined list of all their smallholders and ascertained each of their location and status. This is compiled into a Company database. The company has agreed to collect the FFB from these defined independent smallholders (which later on were defined as associated smallholders but followed still the independent smallholder guidance as per PNG NIWG)
	A sample of 33 smallholder growers was interviewed and oil palm blocks inspected as a representation of the 1,698 smallholders of New Ireland (2,378.58 ha).



The Poliamba Smallholder Affairs (SHA) and Sustainability team are to be commended for their efforts in organising the growers for interview and patience during the interviews and field inspections that followed. The auditor was accompanied by the SHA Manager and staff, a Sustainability officer and the OPIC Field Manager and staff, at all times during the audit. The accompanying team (Poliamba & OPIC representatives) did not interfere with the interviews.

Relevant SHA and OPIC records were inspected and issues were discussed in detail with the Poliamba SHA Manager and relevant the company staffs after the field interviews.

The interviews consisted of a series of questions which required the block holder or caretaker to respond to the Round Table for Sustainable Palm Oil (RSPO) Principles and Criteria.

The validity of the smallholder survey results was tested by selecting a sample of 33 Smallholders that were representative of a range of conditions and subjecting these to field audits. This figure is well in excess of the RSPO sampling guidelines. BSi also interviewed Smallholder representatives who had been involved in the baseline survey and confirmed their knowledge of the relevant RSPO P&C's.

Both estates and smallholders is audited against RSPO P & C Generic Standard, 2013.

Other Certification	ns en		
Certificate	Standard(s)	Certificate Issued by	Expiry Date
Number	. ,	•	
-	-	-	-

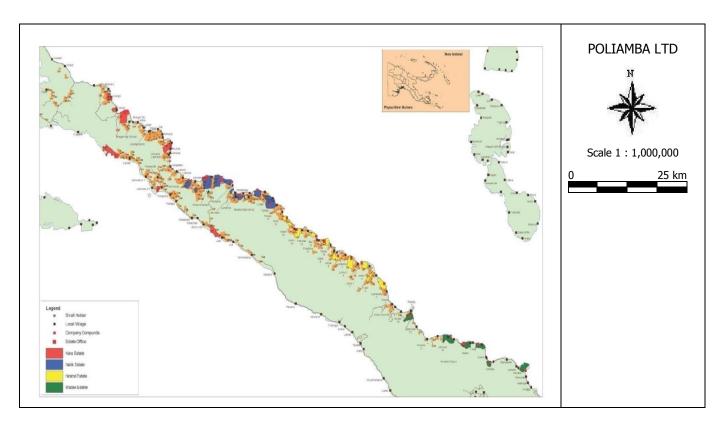
1.3. Location(s)	1.3. Location(s) of Mill & Supply Bases							
Name		GPS						
(Mill / Supply Base)	Location [Map Reference #]	Easting	Northing					
Lakurumau Palm Oil Mill	Lakurumau, New Ireland Province, Papua New Guinea (PNG)	E 151º 16' 33.36"	S 2º 52′ 26.89″					
1. Kara Estate	Kavieng District, New Ireland Province, Papua New Guinea	E151°01'42" - 151°11'5.9"	S02º42'23" - 02°48'39.6"					
2. West Coast Estate	Kavieng District, New Ireland Province, Papua New Guinea	151°1′9.1″ – 151°17′34.7″	S02°48′49.4″ - 02°58′56″					
3. Nalik Estate	Kavieng District, New Ireland Province, Papua New Guinea	E151º12'54" - E151º25'47"	S02°52'14" - S02°55'57"					
4. Noatsi Estate	Namatanai District, New Ireland Province, Papua New Guinea	E151º27'23" - E151º42'19"	S02°57'38" - S03°06'35"					
5. Madak Estate	Namatanai District, New Ireland Province, Papua New Guinea	E151º45'21" - E152º02'28"	S03°08'35" - S03°15'35"					
6. Smallholders	Kavieng and Namatanai District, New Ireland Province, Papua New	West: E151º01'42" - E151º20'43"	West: S02º48'34" - S02º59'56"					
	Guinea	North: 150°57'0.4104" – 150°15'24.6708" South: 151°17'10.9356" –	North: -2°41'2.7816" - -2°52'48.0612" South: -2°52'16.3092" -					
		151°50′8.1132″	-3°11′17.7864″					





Figure 2. Location of Poliamba Ltd in New Ireland Province, Papua New Guinea (PNG).





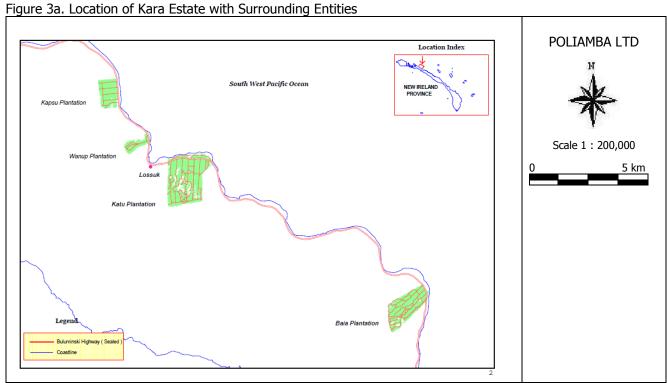
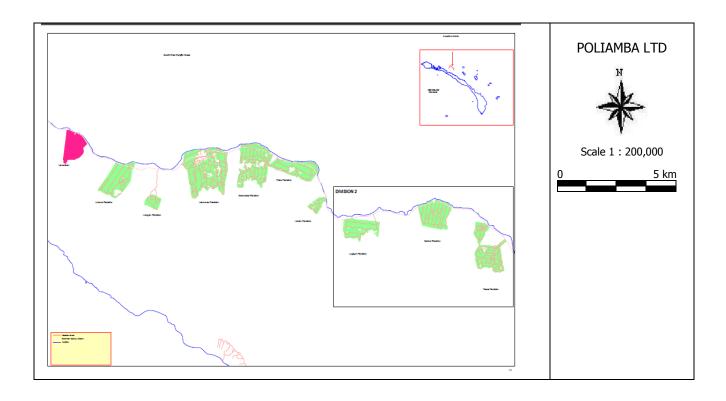
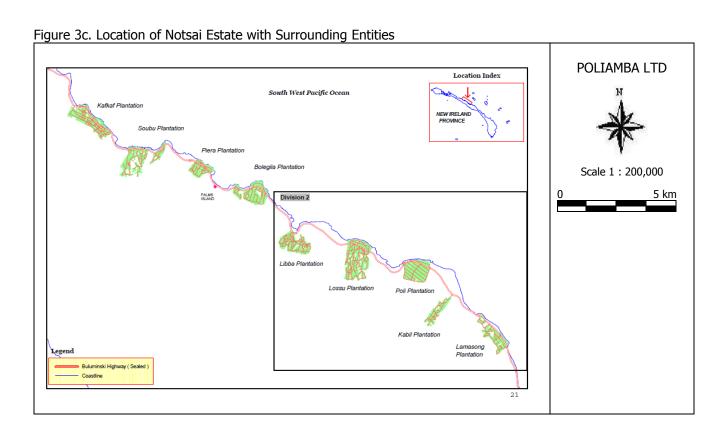


Figure 3b. Location of Nalik Estate with Surrounding Entities









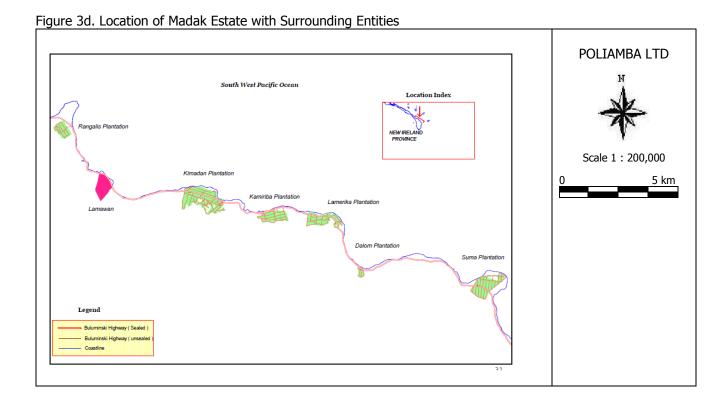
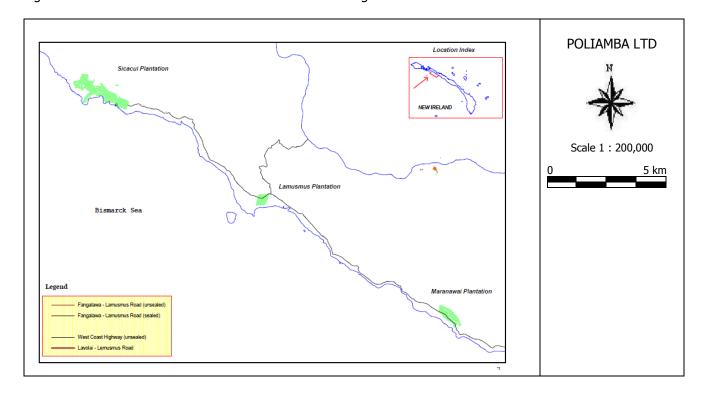


Figure 3E. Location of West Coast Estate with Surrounding Entities





1.4. Description of	1.4. Description of Supply Base (Ha)							
Estate	Mature	Immature	Total Planted	Others	Undeveloped Land	Total Tittle	% of Planted	
1. Kara Estate	383.35	540.74	924.09	42.91	65.10	1,032.10	11.66	
2. West Coast Estate	455.43	0.00	455.43	28.66	265.75	749.84	5.75	
3. Nalik Estate	1,256.13	606.85	1,862.98	182.36	621.41	2,666.75	23.52	
4. Notsai Estate	1,489.63	0.00	1,489.63	104.49	469.98	2,064.10	18.80	
5. Madak Estate	932.72	0.00	932.72	73.20	403.25	1,409.17	11.77	
Sub Total	4,517.26	1,147.59	5,664.85	431.62	1,825.49	7,921.96	71.50	
6. Smallholders	2,535.86	202.72	2,738.58	0.00	0.00	2,738.58	100.00	
Total	7,053.12	1,350.31	8,403.43	431.62	1,825.49	10,660.54		

1.5. Plantings & Cycle								
		Α	ge (Years)		FFB Tonnage / Year			
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (Previous Year)	Actual (This Year)	Forecast (Next Year)
1. Kara Estate	540.74	0.00	0.00	383.35	0.00	16,288	11,268	2,510
2. West Coast Estate	0.00	0.00	153.55	301.90	0.00	9,223	9,835	9,785
3. Nalik Estate	606.85	663.49	43.51	549.92	0.00	19,060	14,233	12,333
4. Notsai Estate	0.00	0.00	311.54	1,178.09	0.00	33,507	28,807	32,029
5. Madak Estate	0.00	0.00	932.72	0.00	0.00	24,721	24,960	26,057
Sub Total	1,147.59	663.49	1,441.32	2,412.45	0.00	102,799	89,103	82,714
6. Smallholders	202.72	673.18	1,489.82	372.86	0.00	24,537	23,254	23,675
Total	1,350.31	1,336.67	2,931.14	2,785.31	0.00	127,336	112,357	106,389

1.6. Certified	Tonnage								
MILL	Estimate	ed (Previo	us Year)	Actu	ıal (This Y	ear)	Project	tion (Next	Year)
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Poliamba POM	127,336	26,612	6,367	112,357	22,334	6,116	106,389	21,554	5,870

Note: Mill Capacity = 30 Mt FFB/hour

Actual in this year: OER = 19.88%

KER = 5.44%

Budget in next year: OER = 20.25%

KER = 5.52%



#### **Section 2 Assessment Process**

### 2.1. Certification Body: PT BSI Group Indonesia

Menara Bidakara 2 17th Floor, Unit 5 Jl. Jend. Gatot Subroto Kav. 71-73 Komplek Bidakara, Pancoran Jakarta Selatan 12870 - Indonesia

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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.

The approach to the audit was to treat each mill and its supply base as an RSPO Certification Unit. The mill was audited together with the plantations of its supply base. A range of environmental and social factors were covered. These included consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. Checklists and questionnaires were used to guide the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

No nonconformities that was identified during this 3<sup>rd</sup> surveillance audit and there are 2 (two) observation will be check in the next re-certification.

#### 2.2. Assessment Program

The following table would be used to identify the locations to be audited each year in the 5 year cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1	Year 2	Year 3	Year 4	Year 5 (Re-Certification)
Poliamba Palm oil Mill	X	X	Х		X
1. Kara Estate	X	Х	X		X
2. West Coast Estate	X	X		X	X
3. Nalik Estate	X	Х	X		X
4. Notsai Estate	X	Х		Х	X
5. Madak Estate	X	X			Х
6. Smallholders	Х	Х	Х		X

**Tentative Date of Next Visit:** 16<sup>th</sup> December 2015

Total No. of Mandays: 8 mandays



#### 2.3. BSI Assessment Team

### **Haeruddin – Assessor (Lead Auditor)**

He holds Bachelor Degree in Forest Management, graduated from Hasanuddin University on 1994. He has 16 years of work experience in forest concession, forestry industry and the latest is within Oil Palm Plantation in Indonesia. He experiences as auditor for several sustainability standard including FSC, UTZ, Organic Farming, 4C, ISPO and RSPO. He completed the ISO 9001 Lead Auditor Course; ISPO Lead Auditor endorsed Course, RSPO Lead Auditor Course, and also completed ISCC, RSPO SCCS, RSPO RED course, etc. He had been involved in RSPO auditing since November 2010 in more than various companies in Malaysia, Thailand, Gabon and Indonesia. During this assessment, he assessed on the aspects of legal, estate and mill best practices, HCV and social community engagement and stakeholders consultation.

#### Hafriazhar Bin Mohd. Mokhtar (Team Member)

He has 13 years of working experience in multiple disciplines mostly engineering, science and technology. Has been acquired many skills from being involved in various industrial environments ranging from construction, plantation, manufacturing and mining before shifted into auditing.

He has experiences in certification section with main responsible as project verification team leader to verify and certify the emission reduction claimed through greenhouse gas emission reduction project activities mainly Clean Development Mechanism. Has Lead Auditor and Auditor qualifications in other sustainable schemes including RSPO, Carbon Footprint, Global Reporting Initiative as well as the ISO EMS, EnMS and QMS. During this assessment, he assessed on the aspects of environmental and OHS

### **Suniljit Singh (Team Member)**

He has 13 years of working experience in multiple disciplines mostly engineering, science and technology. Has been acquired many skills from being involved in various industrial environments ranging from manufacturing, plantation, medical devices,

He was involved in RSPO certification since January 2013, he also has auditor qualifications in other sustainable schemes including such as ISO 9001, ISO 14001, OHSAS 18001, and Social Compliance Audit.

#### Mrs. Cecilie Banjamin (Technical Expert)

She has graduated from B. of Agricultural Science Qld University, Australia 1971 and Certificate of Rural Extension, Wageningen University, Netherlands, 1976. She has various experiences, particularly researcher in develop smallholders, such as oil palm LSS traditional and introduced crop, agriculture field program in PNG. She involved in "Agricultural Sociologist for smallholder oil palm productivity study for 13 years (1990 -2013). During this assessment, she assessed on the legal, social aaspects and stakeholders consultation.

#### **Accompanying Persons:**

This summary report was reviewed by ....., he is BSI's RSPO internal reviewer.



### **Section 3 Assessment Findings**

### 3.1 Details of Audit Finding

	Criterion / Indicator	Assessment Findings	Compliance
PRINCI	IPLE 1: COMMITMENT TO TRANSPARENCY		
Criterio	on 1.1:		
Grower	s and millers provide adequate information t	o relevant stakeholders on environmental, social and legal issues	relevant to RSPO Criteria,
in appr	opriate languages and forms to allow for effe	ctive participation in decision making.	
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.  - Minor compliance -	social and legal. This information is publicly, such as: Land titles/Leases, maps of lease areas, Annual Reports, Sustainability Reports, Policies and Guidelines, water management plans, environment plans & environment	Yes
		General Manager, Group policies and procedures are available in public area in estates and mill.	
1.1.2	Records of requests for information and responses shall be maintained.  - Major compliance -	The company has established procedure related information request, request informations were recorded in log book, a few request information were noted in 2014, e.g. from PNG Medical Research on 4 March 2014 to collect medical data, it's respons in the same day. Mostly request from stakeholders related donation, road maintenance in compound surrounding the company, slash grass field, education, etc. Based on document review, it was seen that all request from local communities has been responded timely manner.	Yes



Criterion / Indicator	Assessment Findings	Compliance
Criterion 1.2:  Management documents are publicly available, except negative environmental or social outcomes.	where this is prevented by commercial confidentiality or where disclosure o	f information would result in
Publicly available documents shall include, be are not necessarily limited to:  • Land titles/user rights (Criterion 2.2); • Occupational health and safety plate (Criterion 4.7); • Plans and impact assessments relating environmental and social impacts (Criterion 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3) • Pollution prevention and reduction plate (Criterion 5.6); • Details of complaints and grievance (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13).  - Major compliance -	maps of lease areas, Annual Reports, Sustainability Reports, The company Policies and Guidelines, Environmental Policies, Equal Employment Opportunity, Water Management Plan, Sexual Harassment Policy, Environment Plans & Environment Permits, Copies of Government laws, regulations, Code of Practices, DEC Permit Compliance, Environmental Monitoring Reports, Production Reports, FFB pricing information, Financial Report, and employee training are publicly available for stakeholders.  For the Land Titles will be made available on request if appropriate. Land Titles are in the public domain and are readily available through Provincial Government offices  Documents pertaining to financial information can only be shared upon	



	n 1 3·							
	Criterion 1.3: Growers and millers commit to ethical conduct in all business operations andtransactions.							
		<u>, '</u>						
1.3.1	code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.	The company has established code of ethical business conduct, 2011 which has been socialized to workforce.	Yes					
	- Minor compliance -							
PRINCI	PLE 2: COMPLIANCE WITH APPLICABLE LAW	S AND REGULATIONS						
Criterior	n 2.1							
There is	compliance with all applicable local, national and ra	tified international laws and regulations.						
2.1.1	Evidence of compliance with relevant legal requirements shall be available.  - Major compliance —	There is in place a documented system which includes the process for ensuring that all legal requirements are known and documented. This information is passed on to the relevant areas of operations to ensure that all involved are aware of any changes to laws or any new laws introduced. The Sustainability Manager is responsible for managing the process of ensuring all legal requirements are known and met.	Yes					
		All permits and licences viewed were current at this time which represented an improvement by the various government agencies from previous years. This included for example all water use permit, weight-bridge permit, and Boiler Licenses and Permits.  All growers interviewed demonstrated understanding of appropriate land						



	Criterion / Indicator	Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained.	Soft copies of key relevant legislation, a list of applicable Laws and Acts relevant to plantations in PNG and other requirements available. The documented system includes Waste Management Plan, Environment Monitoring and Management Plan & Environment Permit.	Yes
	- Minor compliance –	DLIR Reports – Department of Labour and Industrial Relations Report was evident.	
2.1.3	A mechanism for ensuring compliance shall be implemented.	Periodical evaluation of compliance. Latest conducted on 27 Jan 2015 by Sustainability Department.	Yes
	- Minor compliance —	The Sustainability Manager is responsible for monitoring compliance. Compliance review is undertaken annually which was reviewed latest on 23 <sup>rd</sup> January, 2015. The organization is updated in the event that there is a change that may alter compliance requirements. If the Sustainability Dept is alerted to changed legislation, the General Manager determines who should be responsible for conducting a review of the changed requirements to determine if a change in Company processes is required. License and Permit Register with compliance section were checked against each permit or related legislations.	



	Criterion / Indicator	Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented.  - Minor compliance –	Tracking changes done through Pacific Islands Legal Institute Information website: <a href="http://www.paclii.org">http://www.paclii.org</a> By internal auditors.  The organization utilizes the services of the Legal Office based in West	Yes
		New Britain to produce annual review of all relevant laws and regulations. All laws and statutes enforceable in Papua New Guinea can be found on Pacific Islands Legal Institute Information website  ( <a href="http://www.paclii.org">http://www.paclii.org</a> )	
		Any changes detected during this review are communicated to Sustainability and appropriate Departments for relevant actions. If changes require amendments to Management Guidelines then these will be revised and staff responsible for implementing will be advised accordingly. For changes not requiring revision of management guidelines but requiring changes in practice, these will be communicated directly to Heads of Departments.	
		All required changes to management are tracked via internal audits.	



	Criterion / Indicator	Assessment Findings	Compliance		
Criterio	riterion 2.2				
		nately contested by local people who can demonstrate that they have legal, c			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.  - Major compliance -	The company landholdings are all State Agricultural Leases that were established by the former owners of the company. The company holds a copy of all State Leases and the use of the land is consistent with the terms and conditions. These documents also show a history of land tenure and the actual legal use of the land and include records of any transfers of deeds. <i>Ownership has been legally transferred to POLIAMBA</i> .  All requirements with regards to this lease are being met by the company with details of all portions current including dates on the lease. The earliest is expiring in 2024 and the latest in 2025.  All Land Titles are in place.  The company Field Department maintains copies of all smallholders title	Yes		
2.2.2		(Clan Land Use Agreement). The CLUA assists in minimising disputes by splitting land into smaller family groups (this reduces disputes). Some smallholders will use their CLUA's as collateror for a loan and the CLUA's are then held held with the bank.	V		
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained.  - Minor compliance —	There is evidence that legal boundaries can be clearly identified. Boundaries are marked on maps and with titles - some are marked with boundary pegs - have been previously surveyed. Pegs are being replaced if necessary once the survey has taken place. Maps of boundaries identified the position of boundary pegs once located and marked both on maps and via GPS.	Yes		
		There are no operations outside the legal boundaries of the plantations noted during audit.			



	Criterion / Indicator	Assessment Findings	Compliance
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).  - Minor compliance –	Based on document review, field visit and stakeholder interview with smallholders, there were no disputes with regards to the leases held by the company.	Yes
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.  - Minor compliance –	Based on document review, field visit and stakeholder interview with smallholders, there were no disputes with regards to the leases held by the company.	Yes
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).  - Minor compliance –	Based on document review, field visit and stakeholder interview with smallholders, there were no disputes with regards to the leases held by the company.	Yes
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.  - Major compliance -	Based on document review, field visit and stakeholder interview with smallholders, there were no disputes with regards to the leases held by the company.	Yes



	Criterion / Indicator	Assessment Findings	Compliance		
Criterio	Criterion 2.3				
Use of t	he land for oil palm does not diminish the legal, cus	tomary or user rights of other users without their free, prior and informed con	nsent.		
2.3.1	extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping	'	Yes		
	involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Sketch maps for all of the VOP (Village Oil Palm) were available during this assessment. These were in good condition and very detailed.			
	- Major compliance –	VOP's blocks are established on Customary Land. The CLUA is an agreement whereby the clan leaders allow the VOP grower to plant oil palm on a particular piece of land.			
		The planting approval form used by the smallholder growers includes approval of land use for oil palm to the grower by the local clan chief (Maimai), and a statutory declaration from a Commissioner for Oaths.			
		Land disputes are settled through the traditional system and the government system. This system works well for the smallholder growers.			



	Criterion / Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:  a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.  - Minor compliance —	There are copies of the small amount of negotiated agreements available detailing processes of consent - Copies of negotiated agreements are available with the Lands Officer.  Currently, there is no land dispute was noted.	Yes
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.  - Minor compliance –	All information related to oil palm development, social-economic and environmental impact assessment is available in national language. The company assisting and supporting smallholders' oil palm plantation operation.	Yes

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	Criterion / Indicator	Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.  - Major coimpliance -	The company is able to demonstrate that local communities are represented and participated during the meeting with stakeholder, discussing the social-economic and environmental planning. The meeting involving all relevant stakeholders, institution and representative of surrounding communities.	Yes
PRINCIPI	LE 3: COMMITMENT TO LONG-TERM ECONOMIC A	ND FINANCIAL VIABILITY	
Criterion			
	an implemented management plan that aims to ach		
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.  - Major compliance -	The company has prepared budget plan for 10 year (2015 – 2024) and reviewed annually. Budaget plan is consist of FFB Production OER, KER, replanting program, cost, expenditure and revenue, e.g. Projected in 2015: FFB: 106,566 tonnes, CPO: 21,554 tonnes (OER: 20.25%), PK: 5,873 (KER 5.52%) and PKO: 2,403 (KOER: 40.90%)  The production (FFB, CPO, PK and PKO) is reviewed annually and	Yes
		compared against expenditure each year with projects in place for future years. This includes costs per tonne FFB and CPO	
3.1.2	An annual replanting programme projected for a minimum of five years (but longer wherenecessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.  - Minor compliance —	A replanting programme is available, progress of replanting as programmed from 2011 – 2020. Replanting program covering: year of replanting, estate, Division, block no., and acreage. 5,658.31 ha areas of replanting program since 2011 and continued up to 2020.  Review of replanting program from 2011 – 2014 against program was conducted.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
PRINCIPL	LE 4: USE OF APPROPRIATE BEST PRACTICES BY (	GROWERS AND MILLERS	
Criterion	4.1		
Operating	g procedures are appropriately documented, consis	tently implemented and monitored.	
4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented.  - Major compliance -	The company defines its Standard Operating Procedures (4.1.1) in what it terms Management Guidelines (MGs). MGs are used as the framework for all operations.	Yes
		The company refers to MG's and the Recognised Industry Field Handbooks for guidance.	
		Management Guidelines and SOPs are available at each respective department.	
		The mill has in place work instructions for all mill activities. They are available in the mill and at the area of operations. Mill SOP's are positioned in the vicinity of operational area.	
4.1.2	A mechanism to check consistent implementation of procedures shall be in place Minor compliance —	The company conduct internal audit and regular inspection by Agronomist to monitoring Operational performance, e.g. Visiting Report on $21^{\text{st}} - 28^{\text{th}}$ January 2015	Yes
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate.  - Minor compliance —	The following mechanism / processes are utilized to assure compliance to the NBPOL SOP:  - Department Internal Control.  - Sustainability Department Internal audits,  - Visiting Advisor for the estate and mill.  - Group Operation Advisors Visit  - Mill Inspection Report  - DLIR Compliance  - RSPO audit Corrective Action Report  - Plantation inspection report  - Field Manager write ups.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).	Third party FFB are brought from Smallholders, FFB is recorded in the company Database.	Yes
	- Major compliance -	Docket ticket is printed in Weight Bridge System.	
Criterio			
		soil fertility to, a level that ensures optimal and sustained yield.	
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.  - Minor compliance —	The company has procedures for good agriculture practices to maintain soil fertility.  The procedures consist of manual and mechanical fertilizer application, EFB application, Land Application and frond pruning.  The smallholders applied fertilizer once/year for producing palms four years of age and above. Usually applied in a staggered application by growers. 3 ha block divided into 4 parts and 5 bags of fertilizer applied at 2 kgs per palm. When funds allow, the next quarter of the block has fertilizer applied and so on till all four areas are fertilized in 12 months. Soils have a wide range of types from alluvial, to clay loams, which will have recommended fertilizer needs for production. Mostly fertilizer used is Ammonium Sulphate and Muriate of Potash. Fertilizer rates are determined by field trials with OPRA. There are a range of soil types within smallholder plantings. The smallholders understand well the need for fertilizer and why they need it.	Yes
		The company supplies MOP and AN fertilizers to growers and organize for deductions from crop sales. Fertilizers were distributed to all blocks, either as annual supply or biannual supply. There were recommendations made from NBPOL to distribute monthly supplies of which a few farmers were engaged in (the SHA Manager advised of this arrangement even though none of the farmers interviewed were under this arrangement)	



	Criterion / Indicator	Assessment Findings	Compliance
4.2.2	Records of fertiliser inputs shall be maintained Minor compliance —	Fertiliser use is being recorded and monitored. Fertiliser inputs (4.2.1) are recorded for each estate - including recommendation and application against recommendations  Records indicate type of fertiliser used and block numbers of areas where it is applied including amount applied, e.g. applied MOP 900 kg on 05 <sup>th</sup> January 2015 in block no. AA 0020 (11.67 ha, SPH 128), or 1.40 kg/palm tree/cycle.  Monthly manuring programme for oil palm 2014 and actual is recorded in computerize system and recommendation for 2015 is available and monitored.	Yes
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.  - Minor compliance —	Soil sampling, leaf sampling and fertilizer recommendation are preparing by TSD (Technical Services Dept.)  Foliar and soil analysis is conducted by "Applied Agriculture Resources Sdn. Bhd"  Leaf sampling on 22 April 2013 for fertilizer recommendation 2014 and Soil sampling on 22 April 2013.	Yes
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.  - Minor compliance —	There is a nutrient recycling strategy in place, EFB, Frond Stacking, Palm residues are used in the field at harvesting and spreading of EFB. There is also the use of fibre and shell to reduce use of fossil fuels in furnace - assists in power generation.  Maps are available of where by-products such as EFB are applied.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
<b>Criterio</b> Practice	on 4.3 s minimise and control erosion and degradation of s	oils.	
4.3.1	Maps of any fragile soils shall be available.  - Major compliance -	No any fragile soil in New Ireland Province due to limestone geology.	Yes
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).	RSPO guidelines NBPOL'spolicy is not to plant on slopes greater than 25 degree. There are no planting areas over 25° was noted in Poliamba Plantation.	Yes
	- Minor compliance —	There are some blocks on low slope but most of the smallholder oil palm blocks in New Ireland are planted on flat land with negligible risk to soil erosion	
		Smallholder growers interviewed understood soil erosion and even though for almost all of them, their blocks were not on steep slopes and were not at high risk of erosion, they expressed understanding of stacking fronds against the slope to discourage soil erosion.	
4.3.3	A road maintenance programme shall be in place Minor compliance –	A plan for road maintenance including roads, blocks and time frames as well as budgets has been produced for 2015 for all estates.	Yes
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.  - Major compliance –	N/A (No peat soil was noted within the company areas)	N/A



	Criterion / Indicator	Assessment Findings	Compliance
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the longterm viability of the necessary drainage for oil palm growing.  - Minor compliance –		N/A
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).  - Minor compliance –	All areas Soils are very shallow top soil (60 cm $-$ 100 cm) in New Ireland and based on coral with low nutrient, the company put more nutrient to increasing the soil fertility.	Yes
Criterion			
	maintain the quality and availability of surface and		
4.4.1	An implemented water management plan shall be in place.  - Minor compliance —	A Water Management Plan has been developed as part of the established Poliamba Sustainability Management System Manual, issued January 2015 where the implementation was evident in both mill and estates for its monitoring activities. Among the monitoring conducted were mill effluent water qualities (BOD etc.), drinking water qualities and discharged water qualities (upstream and downstream of discharge point river water), water extraction and water discharge.	Yes
		The smallholders are fully aware of the need to protect surface and ground water. This was one of the reasons why so few growers use chemical poisons for weed control.	



Criterion / Indicator		Assessment Findings	Compliance
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.  - Major compliance -	The riparian buffer zones are maintained in good condition. The buffers in existing plantations were inspected and found to be within the limits as prescribed by the environmental permits and logging code of practice for each estate (50 meter from beach side and 100 metres from watercourse). Some of area in particular beach side established as buffer zone during replanting.  All permanent water courses have buffers in place and with signage indicating the location and extend.	Yes
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).  - Minor compliance –	BOD is tested on weekly basis from the Mill Laboratory. Quarterly samples are sent to SGS PNG Laboratory for analysis as per the Environmental Waste Discharge Permit, e.g. SGS Laboratory Report Cover Sheet; Dated: 24 <sup>th</sup> Nov, 2014; Sampling Date: 11 <sup>th</sup> November, 2014; Laboratory Report Number: PG01869. Areas sampled Lamerika Creek, Kameriba Well, Bolegila Bore, Fileba Creek, Maramakas Bore, Lakurumau Bore 1 & 2, Lamau & Katu Tap, PAN 1, 2, 3 and 4. It was noted that mill effluent is compliance with national regulations.	Yes
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.  - Minor compliance —	Poliamba Oil Mill monitors daily water usage. Mill KPI report sent out on a monthly basis. NBPOL group target of 1 metric tonne of water per tonne of FFB processed.  Water usage per mill tonne/tonne FFB monitored on monthly basis from Jan to Dec 2014. Average reading is 1.12 metric tonne / tonne FFB.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
Criterio			
		effectively managed using appropriate Integrated Pest Management technique	
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored.  - Major compliance -	specific pests including Sexava, bagworm and oryctes as well as other pests including weed infestations. The IPM nominates a number of methodologies for managing certain pests including pest monitoring, selective use of chemical treatment, and encourage establishment of biocontrol agents.	Yes
		A policy of minimal use of pesticides (herbicides in particular) is in place. Growers are aware of PPE requirements for sprayers.	
		There is good support from Poliamba, OPIC and PNGOPRA to growers with regards to oil palm pest and disease management. There have been some treatment of smallholder blocks for Sexava by Poliamba Technical Services Division (TSD) and there was a Ganoderma sanitation team registered by OPIC and trained by TSD. All works done were with directions from PNGOPRA who have a representative in Poliamba that liaises with PNGOPRA Dami for prompt response to pest and disease queries.	
4.5.2	Training of those involved in IPM implementation shall be demonstrated.  - Minor compliance —	A record of training for handlers of pesticides is in place and includes techniques such as PPE used and spraying control.  The smallholders received training from the company related to the IPM. Ganoderma and Sexava training was scheduled into the field day programmes and materials used in the training of the smallholders were sighted.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
Criterio			
Pesticide	es are used in ways that do not endanger health or		
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective roducts that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.  - Major compliance -	the reason for the use of certain chemicals. There is an updated register which records products used, when required, amounts to be used and	Yes
		SHA is doing awareness on pesticide usage and handling during the field days.	
		The company not to supply any chemicals to any smallholders, weeding by bush knives is conducted. No chemicals used and no store outlets in Kavieng also. Bush knives for a grower are widely available in New Ireland to be purchased outright by growers.	
		Chemicals to control Sexava if required are administered by the Technical Services Division full PPE observed.	
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.  - Major compliance -	Records of herbicide use are available and maintained at each estate. The records shows the total chemical used (in kg and/or liters), the active ingredients used, total area treated (in Ha), and active ingredients used per area treated and per ton FFB produced, e.g. applied herbicides Glyphosate 16.8 liter in Block No. AA080 (28.84 ha) on 6 <sup>th</sup> February 2015 and applied Ally 0.384 kg in Block no. 220 (29.12 ha) on 11 <sup>th</sup> December 2014 and pesticides record included active ingredient and pesticides LD50 Were applied.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.  - Major compliance -	Plantation.	Yes
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.  - Minor compliance –	There is in place an ongoing method which is controlled via the IPM with regards to the use of WHO Type 1A or 1B chemicals. The company is able to demonstrate that Type 1A chemicals are not used by application records and purchasing records/stock control. Poliamba Plantation use limited type 1B chemical (Methamidophos) which is used for control of Sexava and is applied by a specially trained team.  Paraquat is no longer used.	Yes
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).  - Major compliance -	Up to date records of training are kept in each estate for the following:  Pesticide Mixers  Pesticide Sprayers  Any pesticide handlers in stores  The training data is also maintained to show the nature and content of the training covered.  Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the storage and areas of mixing.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).  - Major compliance -	, ·	Yes
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts.  - Minor compliance —	, ,	Yes
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.  - Major compliance -		Yes



4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).  - Minor compliance –  There is a minimum requirement of PPE that must be used in the handling and application of pesticides. PPE specifications are stated in the MG and further demonstrated in training manuals.	Criterion / Indicator	Assessment Findings	Compliance
PPE for sprayers is supplied and its use demonstrated in the training programs. The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.  All sprayers and mixers sighted during the assessment were using the correct PPE which is supplied by the company.  Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken	4.6.9 Maintenance of employee and associat smallholder knowledge and skills on pestici handling shall be demonstrated, includi provision of appropriate information materi (see Criterion 4.8).	Records of training are kept in each estate for all workers who come into contact with pesticides this includes Pesticide Mixers, pesticide Sprayers and any chemical handlers in the stores.  The training data is available and centrally in all estates for whoever handles pesticides.  There is a minimum requirement of PPE that must be used in the handling and application of pesticides. PPE specifications are stated in the MG and further demonstrated in training manuals.  PPE for sprayers is supplied and its use demonstrated in the training programs. The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.  All sprayers and mixers sighted during the assessment were using the correct PPE which is supplied by the company.  Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be	



	Criterion / Indicator	Assessment Findings	Compliance
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).  - Minor compliance —	Empty chemical containers were reused to carry mixed sprayer chemicals into plantation for use. Once they are deemed unusable they are triple rinsed, punctured and disposed in the Chemical Pit at the Nalik Estate Central Landfill.	Yes
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.  - Major compliance -	All pesticide handlers underwent the medical surveillance coordinated by the company's Health Extension Officer for every six months. Upon checking, those who are found to be fit to handle pesticide are issued with green cards and all medical records are kept by the Health Extension Officer. Health surveillance was conducted stage by stage for the pesticide handling gangs for all divisions of whole estates. Records shown the latest health check-up was conducted for the Sexava chemical handling gang in Kara Estate on 10 December 2014. The checking includes Physical Examination, Lab Test Hemoglobin and Lab Test Urine. Results shown normal conditions for all parameters for all chemical handlers and granted with green cards accordingly.	Yes
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women.  - Major compliance —	Based on interview with female worker, it's confirmed that no pregnant and/or breast-feeding involved in chemical/pesticides, they are transferred to other duties.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
Criterio	n 4.7		
An occup	pational health and safety plan is documented, effectional	ctively communicated and implemented.	
4.7.1	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.  - Major compliance -	An Occupational Health and Safety Policy has been established and in place. It was issued and signed by the General Manager on 11 <sup>th</sup> December 2013 which is applicable to mill and plantations as well as all other support activities including construction, clinic and workshop.  A health and safety plan covering all activities has been well documented as the Operational Safety Management Plan (OSMP) for each individual operating unit with different activities (mill, plantation, construction, clinic and workshop). Samples of OSMP viewed amongst all are POL SMP Mill Revision 5 Dated 22 December 2014 Version 5 for Poliamba Oil Mill and POL SMP Field Estates v5-Kara Revision 5 for Kara Estate.	Yes
4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.  - Major compliance -	The hazard identification and risk assessment for all the worksites was properly documented in the OSMP where it was tabulated as the Risk Severity Table and Workplace Risk Assessment. The risks were assessed based on its probability and severity matrix where for identified significant risks, control actions and measures have been established accordingly. The control measures were implemented based on specific procedures which were well documented as the Safe Operation Procedures.	Yes
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.	The internal training has been implemented according to the established POL Annual Training Plan for all departments, a training matrix done by all departments. There's also additional training being planned by the individual department according to its own related activities. The latest training matrix consists of the planned and actual training conducted has been kept and updated in the server. It was found adequately cover all potentially hazardous operations including pesticide operation, harvesting and spraying.	Yes
	- Major compliance -		

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	Criterion / Indicator	Assessment Findings	Compliance
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.  - Major compliance -	A total of 11 personnel have been appointed as the OHS Committee Reps whom representing various sections of work area within the Plantation Operation chaired by the Plantation Manager. Records of the OHS Committee Meeting sufficiently shown that the meeting has been conducted on a monthly basis. OHS related issues were discussed sufficiently with the fixed agenda indicated review of accident statistics, review of accident reporting system, review of committee member, review of inspection findings, training, policy and procedures, external audit action points (RSPO) and other matters. Latest meeting was conducted on 10 December 2014.	Yes
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.  - Minor compliance —	Accidents and emergency procedures are included in the NBPOL Poliamba	Yes
4.7.6	All workers shall be provided with medical care, and covered by accident insurance.  - Minor compliance –	There are company clinics (4.7.6) on all plantation divisions and a centralised clinic at the Head Office compound. All are staffed by trained health workers apart from and/or Registered Nurses who are on call 24 hours a day.	Yes

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	Criterion / Indicator	Assessment Findings	Compliance
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.  - Minor compliance —	All occupational injuries case was assessed using the Injury Assessment Report where all related information including the type and cause of injury were reported. For the year 2014, the records shown zero fatalities case which has been continued since the past five years.  Based on the incident reporting procedure established, the occupational injuries were recorded using Lost Time Accident (LTA) metrics and calculated accordingly through NBPOL LTA Rate Excel Spreadsheet.  Based on the record, POL LTA Report, the number of LTA for Poliamba certification units = 8.59.	Yes
Criterior	า 4.8		
All staff,	, workers, smallholders and contract workers are app	propriately trained.	
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.  - Major compliance —	Formal training programme that covers all aspects of the RSPO Principles and Criteria was developed & delivered by the Sustainability Department. Training plan has been developed based on the training needs analysis (TNA) conducted. The TNA was done annually by the Training Managerbefore sent to the General Manager for approvals. Approved trainings were conducted as per plan where the training attended by respective employees will later be evaluated its effectiveness. Records shown that the training programme has been fully implemented according to the company's training procedures	Yes
4.8.2	Records of training for each employee shall be maintained.  - Minor compliance –	Training records consist of the certificates, attendances and training materials were kept in the individual operating units as well as sustainability department records. Copies of certificates were sighted kept by sustainability department for sampled program which is the Occupational Health and Safety Officer Level 1 Training Program that was done on 22 <sup>nd</sup> to 25 <sup>th</sup> July 2014 for 30 operational staff from all operating units.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
Criterion	5.1		
		eplanting, that have environmental impacts are identified, and plans to mitig monitored, to demonstrate continual improvement.	ate the negative impacts and
5.1.1	An environmental impact assessment (EIA) shall be documented.	POL Aspects and Impacts Register dated 15 <sup>th</sup> January, 2015 was available. Previous review was on 14 <sup>th</sup> January, 2014.	Yes.
	- Major compliance -	The register lists the activity, environmental aspect, environmental impact, location, department, control, legal requirement, consequence, probability, severity, significant aspects. Aspects identified were categorized into Positive and Negative. Examples of the activities covered were Mill floor cleaning, POME (Palm Oil Mill Effluent) treatment, Boiler Operation & Steam Use, Septic Waste Water Treatment & Disposal and Electricity Generation.	
		Significant environmental aspects identified were such as land clearing, mill floor clearing, POME Treatment, boiler operation & steam use, fertilizer and septic waste water treatment & disposal.	



	Criterion / Indicator	Assessment Findings	Compliance
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.	place. The implementation of the plan has commenced on April 2014 including an annual review and regular progress update. The action plan covers:  • Minimising the use of pesticides;	Yes
	- Minor compliance —	• Social Impacts.  Example of improvement action that has been completed were education of staff on the need to reduce burning and to ensure rubbish is segregated and correctly in landfill sites and bore hole viability check.  Evidence on sampled completions of action plan were in form of training attendance records on RSPO Principles & Criteria on 19 <sup>th</sup> Jan, 2015 and viability check with water testing on Bore #1, Bore #2 and Bore #3. Water Analysis report Job No: 525/014 from National Analysis Laboratory, dated: 13 <sup>th</sup> October, 2014.	



Criterion / Indicator	Assessment Findings	Compliance
This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.  - Minor compliance –	Poliamba Ltd Environmental Monitoring & Management Program (EMMP); Revision No: 2; Dated: 20 <sup>th</sup> January, 2015 was evident.  The report is a requirement under the Environmental Permit Approvals and Conditions. It is written based on Department of Environment & Conservation recommendation for Waste Management Monitoring Reference permit No. WD-L2B 249 dated 2 <sup>nd</sup> June, 2010. EMMP report was drafted by the respective Plantation Managers and consolidated by the Company Environment Officer. EMMP report covers elements such environmental impact mitigation strategies, impact identification, management & monitoring for Poliamba Plantation — soil erosion, agrochemicals, fertilisers, chemicals storage and handling, bulk fuel storage and handling and vehicle workshop, Poliamba Oil Mill, product storage and shipping, housing compound, emergency response, replanting process covering nursery site, palm poisoning and nursery spraying-use of the chemicals, use of machineries or equipment and palm stumps disposal.	Yes

#### **Criterion 5.2**

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.



	Criterion / Indicator	Assessment Findings	Compliance
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  - Major compliance -	An assessor selected from the RSPO register of HCV carried out an assessment of the presence of HCVs within and adjacent to the company plantations. The ecologists used the PNG National Interpretation of the HCV Toolkit and prepared a report on their findings. All land within the plantations has previously been used for other agricultural purposes and had previously been extensively logged.  The HCV studies include details on the status of endangered, rare and threatened species. The conservation assessments did not identify any rare, threatened or endangered species of fauna within the plantations or adjacent areas. Within the estate some areas are not planted and these habitats are being left in their natural state. These areas have been identified as HCV 4, Sago swamps with some estate such as Bolegila are being preserved and are used by the local population as sources of food (Sago) and building materials. These areas have been classed as HCV 5.  Buffer zones have been established along all beach side and watercourses and signs erected.	Yes
		The smallholders demonstrated an awareness of the impact of development of oil palm on surrounding natural areas. This has been further emphasised through the planting approval process (controlled by POLIAMBA) where the requirements for independent smallholders have been explained as well as through repeated RSPO awareness sessions. The growers were made aware of the Planting Approval Form (PAF), which includes identifying High Conservation Value (HCV) areas. The RSPO awareness has also assisted existing growers to be better aware of HCVs.	



	Criterion / Indicator	Assessment Findings	Compliance
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.  - Major compliance -	HCV Identification confirmed that no any RTEs species within the company operation and near vicinity.	Yes
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.  - Minor compliance –	The company's employees are prohibited from the hunting and taking of fauna from the plantation and adjacent land . Sign boards have been posted adjacent to buffer zones and other conservation set aside advising of the protected area. Any legal requirements within any areas are applied and enforced by the company management.  The company requires employees and the employees of contractors to sign an agreement that they will not hunt, fish or utilise other subsistence resources. This was sighted for a number of contractors.  There was no indicated inappropriate hunting, fishing or collecting activities in the company areas noted.	Yes
5.2.4	<ul> <li>Where a management plan has been created there shall be ongoing monitoring:</li> <li>The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>Outcomes of monitoring shall be fed back into the management plan.</li> <li>Minor compliance –</li> </ul>	The company has created HCV and conservation management and monitoring plan to ensure that those areas are conserved.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
5.2.5	local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.		Yes
Criterio	- Minor compliance –		
	reduced, recycled, re-used and disposed of in an e	nvironmentally and socially responsible manner.	
5.3.1	All waste products and sources of pollution shall be identified and documented.  - Major compliance –	Poliamba Limited Waste Management Plan; Issue No: 2; Revision No: 1; Dated: 19 <sup>th</sup> January, 2015 details all identified waste products and sources of pollution.	Yes
5.3.2	All chemicals and their containers shall be disposed of responsibly.  - Major compliance -	Empty chemical containers were reused to carry mixed sprayer chemicals into plantation for use. Once they are deemed unusable they are triple rinsed, punctured and disposed in the Chemical Pit at the Lakurumau Central Landfill, this practice was evident as observed during site tour.  Disposal of all wastes were for e.g. on date of disposal, type of waste (industrial, domestic waste and waste oil) and quantity were recorded in	Yes



	Criterion / Indicator	Assessment Findings	Compliance
Criterion Efficiency	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  - Minor compliance —  n 5.4  of fossil fuel use and the use of renewable energy	Poliamba Limited Waste Management Plan; Issue No: 2; Revision No: 1; Dated: 19 <sup>th</sup> January, 2015 was evident.  The plan covers responsibilities of the organization and contractors, waste management and minimization principles, legal regulatory requirements, sources and types of wastes generating activities, site specific potential environmental effects and waste management strategy. Evidence of implementation.  Kara 2015, Disposal / Bowser, Generator, Storage Cleaning Schedule.  Rubbish Disposal every 2 weeks. For example Week 1 & 4.  Bowser, Generator and Interceptors inspection and cleaning every week.  Chemical shed inspection and cleaning – every alternate week. For example every 1 & 3.  Hydrocarbon Storage cleaning – every 3 weeks. For example Week 3 & 6.  Waste register dated 11 <sup>th</sup> Dec, 2014, 23 <sup>rd</sup> Sept, 2014 & 21 <sup>st</sup> July, 2014 details the fertilizer bag, gen-set filter, toner, waste oil, sawdust disposal.  Based on the review of the Incident & Accident Register there is no environmental incidents. SHEQ001 Form is used to record the environmental incidents.	Yes
5.4.1		The company use fibre and shell for boiler. It's recorded in "Monthly	Yes



	Criterion / Indicator	Assessment Findings	Compliance
Criterio Use of fi		ot in specific situations as identified in the ASEAN guidelines or other regional	best practice.
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.  - Major compliance -	The company has has a strong "No Fire" Policy throughout its operations. No open burning was noted during field visit and interviewed with local communities and workers.  The company continues to encourage minimal use of fires on smallholders' blocks through its awareness program. All growers understood the RSPO rules for use of fire sparingly.	Yes
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.  - Minor compliance –	No any open burning was noted, including replanting process.	Yes
<b>Criterio</b> Plans to	n 5.6	se gases, are developed, implemented and monitored.	
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).  - Major compliance -		Yes



Criterion / Indicator	Assessment Findings	Compliance
Significant pollutants and greenhouse ga (GHG) emissions shall be identified, and plar to reduce or minimise them implemented. - Major compliance -	Sources of emissions were from land clearing, fertilisers, field fuel,	Yes



	Criterion / Indicator	Assessment Findings	Compliance
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.  - Minor compliance —	<ul> <li>Monitoring of smoke density emission by automatic or manual. The preferred method is automatic with continuous records being maintained. Records must be maintained permanently, where manual recording is used, an hourly reading should be taken and recorded by a person who has been trained in interpreting smoke density according to the Ringelmann rating method. This was practiced accordingly. In addition monthly effluent tests were also conducted.</li> <li>Evidence of implementation:         <ul> <li>Smoke density reading at average milling of 20 % of total boiler operating hours above 40% Ringelmann – Jan – Dec – 2014.</li> <li>Monthly Effluent Test Results – Total Alkalinity, Pond 4 pH, Suspended Solid, Volatile Acid, Oil and Grease, Temperature, Pond 4 BOD, Reed Bed pH, FFB Milled, Diesel Used / FFB, Water Used / FFB, Water Used per FFB Ratio (Jan to Dec 2014).</li> <li>Monthly Effluent pH Test Results – Mill Effluent pH, Pond 1 pH, Pond 2</li> </ul> </li> </ul>	Yes
DDING	IN E.C. DECRONGINE CONCIDENTION OF EN	pH, Pond 3 pH, Pond 4 pH, Reed Bed pH, EFB Drain pH, Storm Drain pH (Jan to Dec 2014).	CROWERS AND MILLERS
		MPLOYEES AND OF INDIVIDUALS AND COMMUNITIES AFFECTED BY	GROWERS AND MILLERS
	of plantation and mill management that have soci	al impacts, including replanting, are identified in a participatory way, and participatory	lans to mitigate the negative
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented.  - Major compliance -	SIA was conducted by Booyong Forest Science in 2011.	Yes
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties Major compliance -	It is important that the SIA maintains a focus on the main social impacts affecting employees, dependents, smallholders, surrounding communities and potentially other stakeholders. The process of identifying the main social impacts and preparing and monitoring mitigation strategies should be undertaken on a consultative basis with impacted stakeholders	Yes



	Critorion / Indicator	Assassment Findings	Compliance
6.1.2	Criterion / Indicator	Assessment Findings	
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.  - Major compliance -		Yes
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.  - Minor compliance —	The SIA improvement Plan is updated annually, the last update on 4 <sup>th</sup> February 2015.	Yes
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).  - Minor compliance –	The company also consider impact of smallholders in their social impact assessment.	Yes
Criterio	n 6.2		
There ar parties.	e open and transparent methods for communication	on and consultation between growers and/or millers, local communities and	I other affected or interested
6.2.1	Consultation and communication procedures shall be documented Major compliance -	The company has a communication policy and a list of stakeholders. Records of communication are maintained by various departments, depending on the stakeholders involved and nature of the communication.	Yes



	Criterion / Indicator	Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated Minor compliance -	The nominated official designated to manage communication and consultation is the GM of Poliamba Ltd.	Yes
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.  - Minor compliance —	, ,	Yes
Criterio			
		ling with complaints and grievances, which is implemented and accepted by	all affected parties.
6.3.1	resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.  - Major compliance -	<ul> <li>The company may request meeting with the person who laid the grievance</li> <li>Grievance is evaluated</li> <li>Further action may be taken</li> <li>Site visit may occur of the grievance may be passed onto relevant Department for further action</li> </ul>	Yes
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available.  - Major compliance -	The grievances observed during the assessment were generally of a relatively minor nature but appeared to be adequately handled with sufficient details recorded.  Growers interviewed were aware of the grievance mechanism in place. Both SHA and OPIC maintain good grievance records.	Yes



	Criterion / Indicator	Assessment Findings	Compliance		
Any neg	Criterion 6.4  Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous people ocal communities and other stakeholders to express their views through their own representative institutions.				
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  - Major compliance –	The process for identifying legal and customary rights for people entitled	Yes		
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.  - Minor compliance –	which includes identifying legal and customary rights to land ownership and land use rights.	Yes		
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.  - Major compliance –	There have however been no major cases where compensation has been paid due to land issues in the previous 10 years.	Yes		



	Criterion / Indicator	Assessment Findings	Compliance
Criterio Pay and wages.		rs always meet at least legal or industry minimum standards and are suffic	cient to provide decent living
6.5.1	Documentation of pay and conditions shall be available Major compliance -	The minimum wages in poliamba has approval from the Department of Labour and Industrial Relations to pay a minimum rural wages.  Based on review of payments slip, there is no worker's salary below minimum wages.  All contractors are required to sign an agreement that confirms they will meet minimum legal terms and conditions for their employees. Records are maintained by the respective departments.  Most smallholders hire workers to do harvesting and upkeep. All hired workers are paid on piece rate. Harvesters are usually paid between K20 – K50/day, the amount paid more than the minimum wage rate per day.	Yes
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available inthe languages understood by the workers or explained carefully to them by a management official.  - Major compliance -	to the workers detailing of payments and conditions of employment as documented in "Employee Induction Check List".	Yes



	Criterion / Indicator	Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.  - Minor compliance —	The company provides housing for workforce. 14 new housing builded in 2014 and new housing program is continued (14 new housing every year). The company constructs new housing in good condition (new materials, supply electricity, water, sanitation, excellent ventilation, and more living space).	Yes
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.  - Minor compliance –	Traditional market able to access and nearby the compound and also company provided store within compound.	Yes
Criterio			
		nd join trade unions of their choice and to bargain collectively. Where the ri	aht to freedom of association
		oyer facilitates parallel means of independent and free association and barga	
6.6.1		The company's policy respect and support of all workforce to form and	Yes
		are encouraged to raise issues regarding workers conditions.	
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented.	Minutes meeting with "Safety Committee" are available in premises.	Yes
	- Minor compliance –		
Criterio			
Children	are not employed or exploited.		



	Criterion / Indicator	Assessment Findings	Compliance	
minimum age requirements are met.  - Major compliance —  B  fc  A  p  T  lc  h		The minimum age for employment at Poliamba is 16 years of age. There appears to be very good recognition of this requirement among managers responsible.  Based on document review of list of worker and interview, it was not found workers hired or employed by company less than 18 years old.  All the smallholders interviewed were aware of not using children for oil palm work when it might interfere with their educational programmes. The growers did admit to children being used for light work, such as loose fruit picking (under adult supervision) during weekends and school holidays.	Yes	
Any form	n of discrimination based on race, caste, national	origin, religion, disability, gender, sexual orientation, union membership,	political affiliation, or age, is	
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  - Major compliance —	offices in both English and <i>Tok Pisin</i> .	Yes	
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.  - Major compliance —	, , ,	Yes	



	Criterion / Indicator	Assessment Findings	Compliance
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.  - Minor compliance –	The company has procedure hiring workers regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation.  The company is conduct evaluation of workers annually.	Yes
Criterior			
	no harassment or abuse in the work place, and rep		
6.9.1	of harassment and violence shall be implemented and communicated to all levels of the workforce.	, , , , , , , , , , , , , , , , , , , ,	Yes
	- Major compliance –		
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.	Policy to prevent sexual harassment and reproduction right is displayed at the company offices in both English and <i>Tok Pisin</i> .  The Company provides breaks for breastfeeding, maternity leave (6)	Yes
	- Major compliance –	weeks with full salary), and transfers female sprayers/mixers that become pregnant to other duties.	
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.	A Procedures of sexual harassment by identifying type of harassment and investigation will be conducted by management team & if found guilty, disciplinary action will be taken	Yes
	- Minor compliance –		



Criterion / Indicator	Assessment Findings	Compliance
riterion 6.10		
rowers and millers deal fairly and transparently with smallh	nolders and other local businesses.	
.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.	The FFB price is displayed in Mill's notice board.	Yes
- Minor compliance –  10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation)  - Major compliance -	The industry has established a formula for calculating the price that Smallholders in PNG receive for FFB. The government approved formula for working out FFB prices is publically available. The price and formula are made available via printed notices on the extension office notice board.  The company has put in a commendable effort into explaining the oil palm smallholders pricing formula to ensure growers understand how their price is calculated	Yes
.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.  - Minor compliance -	Local contractors are used for a number of activities, including construction and transport. Contracting contributes to local employment and stimulates the level of economic activity in the province.  The audit team found during interview with local contractors, confirmed that contract is legal, fair and transparent.	Yes
.10.4 Agreed payments shall be made in a timely manner.  - Minor compliance –	payment for contractors is paid timely manner.	Yes
riterion 6.11		
rowers and millers contribute to local sustainable developm	nent where appropriate	



Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.  - Minor compliance —	The company receives many requests for assistance, particularly sponsorship and transport assistance. Many of the requests are fulfilled, e.g. road maintenance, engages a number of apprentices and provides support to local vocational schools. Providing support such as transport, loan of plant, agricultural support, etc. Total local contribution in 2014 is K35,493.	Yes
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  - Minor compliance –	The company operates an Smallholders Affairs (SHA) Department that is dedicated to support the smallholders surrounding the company who supply FFB to the company's mill	Yes
Criterio			
	of forced or trafficked labour are used.		
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used.  - Major compliance -	No any form or trafficked labour was noted during assessment.	Yes
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred.  - Major compliance –	Based on document review and interview with workers, confirmed that no contract substitution was noted.	Yes
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.  - Minor compliance –	Workers in Poliamba Ltd mostly permanent workers, temporary workers has signed contract and it was noted no migrant workers.	Yes
Criterio			
Growers	s and millers respect human rights		

...making excellence a habit.™



	Criterion / Indicator	Assessment Findings	Compliance
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).  - Major compliance —		Compliance Yes

#### PRINCIPLE 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

N/A (Not Applicable)

#### PRINCIPLE 8: COMMITMENT TO CONTINUAL IMPROVEMENT IN KEY AREAS OF ACTIVITY

#### **Criterion 8.1**

Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.



Criterion / Indicator	Assessment Findings	Compliance
8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.  As a minimum, these shall include, but are not necessarily be limited to:  Reduction in use of pesticides (Criterion 4.6);  Environmental impacts (Criteria 4.3, 5.1 and 5.2);  Waste reduction (Criterion 5.3);  Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);  Social impacts (Criterion 6.1);  Optimising the yield of the supply base;	<ul> <li>electricity.</li> <li>Planting beneficial plant (<i>Tunera subulata</i>) for natural predator.</li> <li>Build 14 new housing for workers and continued in the future.</li> <li>Supporting scheme smallholders for local communities surrounding company area.</li> <li>Remaining buffer zone along the beach side and watercourse during</li> </ul>	Yes



3.2 Progress against Time Bound Plan

Name of company	Name of Mill	Locatiom	Supply Base		Time Bound Plan	Target Year for RSPO
Guadalcanal Plains Palm Oil Ltd	GPPOL Palm Oil Mill	Guadalcanal Plains, Guadalcanal Province, Solomon Islands	- Tetere estate - Ngalimbiu estate	- Mbalisuna estate - Smallholder Group	2011	Certified March 2011
Poliamba Ltd	Poliamba Palm oil Mill	Poliamba, Kavieng, New Ireland Province, Papua New Guinea (PNG)	- Kara estate - West Coast estate - Nalik estate	<ul><li>Noatsi estate</li><li>Madak estate</li><li>Smallholders Group</li></ul>	2012	Certified March 2012
RAIL	Gusap POM	Lae, Morobe Province, Papua New Guinea (PNG)	- Gusap East estate - Gusap West estate - Surinam estate - Dumpu estate	- Ngaru estate - J Estate - Smallholders Group	2010	Certified August 2010
Higaturu	Sangara POM, Sumbiripa POM and Mamba POM	Oro Province, Papua New Guinea (PNG)	<ul><li>- Embi estate</li><li>- Ambogo estate</li><li>- Sangara estate</li></ul>	<ul><li>Sumbiripa estate</li><li>Mamba estate</li><li>Smallholders Group</li></ul>	2013	Certified February 2013
Milne Bay	Hagita POM	Hagita, Milne Bay Province, PNG	<ul><li>Giligili estate</li><li>Hagita estate</li><li>Waigani estate</li><li>Sagarai estate</li></ul>	<ul><li>Padipadi estate</li><li>Mariawatte estate</li><li>Smallholders Group</li></ul>	2013	Certified January 2013
NPBOL	Mosa POM, Kumbango POM, Numundo POM, Kapiura POM and Waraston POM	Mosa, West New Britain, Papua New Guinea (PNG)	- Bebere estate - Kumbango estate - Togulo estate - Dami/Waisisi estate - Kautu estate - Kaurausu/Moroa estate - Bilomi/Loata estate - Haelia estate - Garu estate - Daliavu estate	<ul> <li>Sapuri estate</li> <li>Malilimi estate</li> <li>Rigula estate</li> <li>Numundo estate</li> <li>Navarai/Karato ME estate</li> <li>Vol/Lot/Nat/Gor ME estate</li> <li>Lolokoru estate</li> <li>Silovuti estate</li> <li>Smallholders Group</li> </ul>	2008	Certified 2008.

All companies under New Britain Palm Oil (NBPOL) have been certified including their smallholders.



#### 3.3. Details of findings

#### 3.3.1. Review of previous assessment finding.

#### 3.3.1.1. Major Nonconformities

No major NC was raised in previous assessment

#### 3.3.1.2. Minor Nonconformities

Ref	Area/Process	Clause		
1039451N0	RSPO P & C, PNG-NIWG, 2012	4.7.2		
	Principle 4. Use of appropriate best practices by growers and millers.			
Scope	SPO 573539			
Details:	A number of identified hazards and risks were not adequately controlled at the time of ASA2. This includes the following: incorrect use of lock out/tag out method, damaged electrical leads, supplied screens not used when welding is taking place, some gas bottles not restrained, some broken electrical switches, damaged gauges on gas bottles			
Requirements:	All operations where health and safety is an issue have been risk assesses actions are documented and implemented to address the identified issues attached to products should be properly observed and applied to the wor	s. All precautions		
Objective Evidence:	Field visit			
Actions:	<ul> <li>The corrective actions were found taken accordingly to resolve all issues raised under the non-conformity. Evidence of corrective actions found during the visit was as following:</li> <li>Training record (dated 11 April 2014) of maintenance personnel on attending machinery breakdown which include the correct use of lock out/tag out method.</li> <li>Purchase order and work instruction record (dated 4 July 2014) of repair of damaged electrical leads.</li> <li>Training record (dated 11 April 2014) of maintenance personnel on safety operational procedures of hot works including welding.</li> <li>All acetylene and oxygen bottles kept in the workshop was sighted to be tidily restrained with newly purchased chains (PO record dated 14 April 2014).</li> </ul>			
	new gauges (PO record			
Closed?:	Yes			



#### 3.3.1.2. Observation was raised in previous assessment

Туре	Area/Process	Clause
Observations	RSPO P & C, PNG-NIWG, 2012	4.2
	Principle 4. Use of appropriate best practices by growers and millers.	
Details:	In 2013, MOP and AN were distributed to smallholder farmers. Some of t "white" in colour and not the familiar "red" colour. For the illiterate grower as they assumed both fertilizers were AN which is "white". Thus they apprentizers at the appropriate rates of AN and were left with some remaining Farmers were not advised that the "other white" fertilizer was in fact MOI fertilizer they usually receive.	ers, there was confusion lied either of the "white" ng bags of fertilizer.
During the interviews, growers also gave varying fertilizer application rates. The confrom number of applications they have to do in a year and the varying amount of sureceive.		
Action	The company has taken action to explain type of fertilizer and how many Based on interview with smallholders, they understood of type and amou apply in their plantation	

Туре	Area/Process	Clause	
Opportunity for	RSPO P & C, PNG-NIWG, 2012	4.6.13	
improvement	Principle 4. Use of appropriate best practices by growers and millers.		
Details:	with regards to blood count and therefore due to poor records from the k	t of Poliamba were not aware of the range for workers applying organophosphates to blood count and therefore due to poor records from the Kavieng Hospital allowed workers with a low blood count to continue for a few days. (Note: Once this the workers were transferred to other duties immediately)	
Action	in Kara Estate on 10 December 2014. The checking includes Physical Exa Hemoglobin and Lab Test Urine. Results shown normal conditions for all process characteristics.	Is shown the latest health check-up was conducted for the Sexava chemical handling gang a Estate on 10 December 2014. The checking includes Physical Examination, Lab Test globin and Lab Test Urine. Results shown normal conditions for all parameters for all cal handlers and granted with green cards accordingly, however if the company found that sult of medical check up is not to be fit handle of pesticides, they are transferred to other immediately.	

Туре	Area/Process	Clause	
Opportunity for	RSPO P & C, PNG-NIWG, 2012	G, 2012 4.7.4	
improvement	Principle 4. Use of appropriate best practices by growers and millers.	ppropriate best practices by growers and millers.	
Details:	A number of workplace inspections are taking place on a regular basis and for reporting any areas which are not considered compliant however there is not follow up of the issues raised to ensure the non compliant areas are rectified	hich are not considered compliant however there is not always evidence of	
Action	The company has taken action if found not compliance in workplace related was verified during audit.	OHS, corrective action	



#### 3.3.2. Nonconformities and Observation Was Raised during this surveillance

No any nonconformity was raised during this surveillance

#### **Observation:**

	Observation
OBS.	Description
1	RSPO P & C, Generic Standard 2013 – Indicator 5.1.1  POL Aspects and Impacts Register dated 15th January, 2015 by the Sustainability Dept and related personnel. Aspects identified were categorized into positive and negative and covers activity, its related environmental aspect and impact, location, department, operational controls, whether the aspect has related legal requirements and calculation on (consequences, probability, severity). Significant and non-significant environmental aspect has been identified & relevant operational controls has been established and communicated was verified on site. Among the main activities covered were land clearing, mill yard run-off, boiler operation and steam use, chemical storage & use and POME (Palm Oil Mill Effluent) Treatment.
	The aspect and impacts register is reviewed on annual basis or where there is significant change on the activities. This indicates in the general that the EIA was conducted accordingly as per principle 5.1.1. However related constructions activities which are construed as not directly related to mill and plantations management were not clearly indicated since similar aspect and impact for example soil and water contamination has been identified.
2	RSPO P & C, Generic Standard 2013 – Indicator 5.6.3  Environment Permit; Environment Act 2000; Permit Number: WD-L2B (249); Date of Issue: 26th July 1991, Date of Amendment: 2nd June, 2010 was reviewed and generally referenced to Environmental Code of Practice for Papua New Guinea Oil Palm Processing Industry, DEC 1997 for mill operations. The new code of practice i.e. Environmental Code of Practice for Papua New Guinea Oil Palm Processing Industry, DEC 2013 which indicates that required quarterly noise readings are to be taken taken at each nominated location and recorded along with time of taking the reading and mill operational status and plan indicating the sampling direction whereby it needs to be verified when it is compulsory to comply (year of implementation).
	Current steps taken were noise mapping, ear-plugs provided and observed worn in high noise areas. In addition monitoring of smoke density must not exceed Ringelmann 2 (40%) for more than 20% of the operating hours of any boiler including transient start-up and shut-down periods which were evident with records shown.

#### 3.4. Positive Finding

	Positive Findings
PF	Description
1	Some of area in particular beach side established as buffer zone during replanting.
2	Builded new housing for workers with good condition and continuing this program for future.
3	The company plays a key role ingenerating economic activity in New IrelandProvince, not only in terms of direct employment and smallholder production, but through the use of local contractors and suppliers and contributions to economic and social infrastructure. This contribution is widely recognised as Poliamba is widely regarded as a good corporate citizen in the province.



3.5. Issues raised by Stakeholders

Issues raised by Stakeholders			
No.	Stakeholder comments	Company Response	Auditor Finding
	Stakeholders were interviews: - Local Contractor (FFB Transport Contractor) Women Representative Workers representative Local Communities Smallholders.		
1	There were no major issues raised by stakeholders during this assessment.  The stakeholders interviewed made no adverse comments about Poliamba. It appears on the whole that people are happy with the advance and improvements being put in place by the management of Poliamba which have a widespread benefit to all.	The company appreciate comments from stakeholders.	Positive comments

#### 3.6. Status of Non Conformities

Reference	Category	Issued	Closed
NC No. 1	Minor	16/11/2011	20/02/2013
NC. No. 2 (467853-1)	Minor	20/02/2013	24/02/2014
NC. No. 3 (467853-2)	Minor	20/02/2013	24/02/2014
NC. No. 4 (467853-3)	Minor	20/02/2013	24/02/2014
NC. No. 5	Minor	26/02/2014	11/02/2015

#### Section 4. Acknowledgement of Assessment

Acknowledgement of Assessment Findings by client	Report Prepared by
Name: Mr. Joe Castle	Name: Haeruddin
<b>Date:</b> 23 <sup>rd</sup> March 2015	<b>Date:</b> 26 <sup>th</sup> February 2015
Company name: Poliamba Ltd	Company name: PT. BSI Indonesia
Title: General Manager	Title: Lead Auditor
Signature: WiNANDY Ignora.  ACTINE OF M.	Signature:



## Appendix "A" RSPO Certificate Details

Poliamba Ltd Lakurumau, Kavieng District New Ireland Province, Papua New Guinea

Certificate Number : SPO 573539
Date of Certificate : 19/03/2012
End of certificate : 18/03/2017

#### Applicable Standard:

RSPO Principles & Criteria: Generic Standard 2013; including RSPO SCCS requirement for CPO Mills, November 2014 – Module D (Identity Preserved)

POLIAMBA PALM	OIL MILL AND S	SUPPLY BASE			
Location Address		Lakurumau, Kavieng, New Ireland Province, Papua			
Location Address		New guinea			
GPS Location		E 151º16.578' – S 02º52.478'			
CPO Tonnage Total		21,554 MT			
PK Tonnage Total		5,870 MT			
PKO Tonnage Total		2,400 MT			
PKE Tonnage Total		3,051 MT			
Own estates FFB Tonnage		82,714 MT			
Smallholders FFB Tonnage		23,675 MT			
GPPOL estates	Mature (ha)	Immature	Total land-use	Annual FFB	
GFFOL Estates	Mature (Ha)	(ha)	titles (ha)	Production (mt)	
Kara Estate	383.35	540.74	1,032.10	2,510	
West coast Estate	455.43	0.00	749.84	9,785	
Nalik Estate	1,256.13	606.85	2,666.75	12,333	
Noatsi Estate	1,489.63	0.00	2,064.10	32,029	
Madak Estate	932.72	0.00	1,409.17	26,057	
Sub Total	4,517.26	1,147.59	7,921.96	82,714	
	_		-	·	
Smallholders	2,535.86	202.72	2,738.58	23,675	
TOTAL	7,053.12	1,350.31	10,660.54	106,389	



## Appendix "B" RSPO SCCS 2014 - MODULE D (IDENTITY PRESERVED)

Criteri	on D.3. Documented procedures.		
	Requirement	Evidence	Compliance
3.1	The site shall have written procedures and/or work instructions to ensure 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.	Update RSPO SCCS procedure as regulated in the "Poliamba Ltd Supply Chain Management Guidelines, Rev. 3, January 2015 and	Yes
	b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	The responsible person in charge to the supply chain system are Mill Manager and General Manager	Yes
3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	The documented procedures for receiving and processing certified and non-certified FFB are included in the Supply Chain Management Guideline, however no any non certified FFB was received in Poliamba Mill.	Yes

Criter	ion D.4. Purchasing and goods in.		
	Requirement	Evidence	Compliance
4.1	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received	The company has separated FFBs certified and non-certified in the system, however record showing that all FFB received is FFB certified due to the company using 'Segregation' model and become IP now, due to new incoming RSPO SCCS standard, 2014.	Yes
4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage	There is no projected over production in Poliamba mill.	Yes

Crite	rion D.5. Record Keeping		
	Requirement	Evidence	Compliance
5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	There are records in place which are complete, up to date and accurate for all requirements from receiving FFB certified form estates and smallholders, receiving FFB in mill through Weight-Bridge system, and dispatch CPO and PK with balancing	Yes



stock monthly and three monthly basis.
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Criterion D.6. Processing.						
	Requirement	Evidence	Compliance			
6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage.	The company only produced CPO certified from their certified source and keep segregated during transported and stored.	Yes			
6.2	The objective is for 100 % segregated material to be reached.	No any contamination with non certified CPO and PK (100 % produced certified CPO and PK)	Yes			

**Certified Mill Production in the last year** 

MILL	CAPACITY	СРО	PK	PKO
Poliamba POM	30 tonnes FFB/hour	22,334	6,116	2,408

**Certified FFB received monthly in previous year** 

Month	Kara Estate	West Coast Estate	Nalik Estate	Noatsi Estate	Madak estate	Smallholders	Total FFB/month
January 2014	1,226	1,027	1,297	2,802	2,454	1,996	10,802
February 2014	959	782	996	2,101	1,937	1,663	8,438
March 2014	1,110	753	1,048	2,197	2,285	1,911	9,304
April 2014	1,020	784	891	1,942	1,816	1,866	8,319
May 2014	1,346	911	1,347	2,873	2,521	2,574	11,572
June 2014	1,272	799	1,214	2,504	2,118	2,469	10,376
July 2014	912	818	1,140	2,524	2,114	2,096	9,604
August 2014	772	876	1,150	2,430	1,954	1,742	8,924
September 2014	840	772	1,074	2,356	1,723	1,548	8,313
October 2014	753	833	1,338	2,678	2,330	1,918	9,850
November 2014	545	762	1,327	2,291	1,979	1,968	8,872
December 2014	513	718	1,411	2,109	1,729	1,503	7,983
TOTAL	11,268	9,835	14,233	28,807	24,960	23,254	112,357

#### Sales of CPO and PKO Product in the last Year

No.	Shipment	Date	Buyer's name	СРО	PKO
1	Shipment 1	15 <sup>th</sup> Feb 2014	Buyer A	4,519.47	520.03
2	Shipment 2	7 <sup>th</sup> May 2014	Buyer B	5,126.91	-
3	Shipment 3	12 <sup>th</sup> July 2014	Buyer C	4,486.91	953.24
4	Shipment 4	3 <sup>rd</sup> Sep 2014	Buyer D	4,049.97	454.57
5	Shipment 5	24 <sup>th</sup> Dec 2014	Buyer E	4,998.10	501
	Total			23,181.36	2,428.84



#### Appendix "C" Audit plan

Date	Time	Description	Haeruddin	Mochtar	Suniljit	Cecilia Benyamin*)
Saturday,	10.10 - 11.30	Flight Honiara – Port Moresby	√	√	√	√
07/02/2015	15.15 – 17.45	Flight Port Moresby - Kavieng	√	√	√	√
		Stay overnight in Kavieng	v V	√	√	√
Sunday, 08/02/2015		Travelling Kavieng – Guest House	√	√	√	√
Monday, 09/02/2015	08.00 - 09.00	Opening Meeting - Presentation by company - Opening meeting by BSI (including introduction of team members and assessment agenda).	√	√	√	√
	09.30 – 12.00	Poliamba Mill (Field Visit): Weighbridge and Receiving FFB Poliamba Mill (Document review): RSPO P & C SCCS	V			
		Poliamba Mill (Field visit):  PPE, safe working environment, walk ways, signs, EFB. POME treatment, emissions, diesel tanks, fire extinguishers, first aiders and boxes, workshop, storage, etc.		V		
		Interview With Smallholder: 16 members of west area (Invited in one place)			√	V
	12.00 – 14.00 14.00 – 16.30	Poliamba Mill (Document Review) RSPO P & C related mill operation	√	√		
		Field Visit: West Area			√	√
Tuesday, 10/02/2015	08.00 - 12.00	<b>Kara Estate: Field Visit</b> Herbicide application programmes, harvesting, fertilising operations, HCV's/conservation areas, riparian zones, water management, road maintenance, terracing, boundary stones, etc.	V			
		Kara Estate: Field Visit Storage, workshop, diesel tanks, landfill, housing complex, clinic and other facilities in line-site.		√		
		Interview with Smallholders: 16 members of South Area (Invited in one place)			√	√
	12.00 - 14.00	Lunch				



Date	Time	Description	Haeruddin	Mochtar	Suniljit	Cecilia Benyamin*)
	14.00 - 16.30	Kara Estate: Document Review	$\checkmark$	$\sqrt{}$		
		Field Visit: South Area			$\checkmark$	√
		smallholders plantation				
Wednesday,	08.00 - 12.00	Nalik Estate: Field Visit	$\checkmark$			
11/02/2015		Herbicide application programmes,				
		harvesting, fertilising operations,				
		HCV's/conservation areas, riparian				
		zones, water management, road				
		maintenance, terracing, boundary				
		stones,etc. (Continued) + <b>Document review</b>				
		Nalik Estate: Field Visit		√		
		Storage, workshop, diesel tanks,		V		
		landfill, housing complex, clinic and				
		other facilities in line-site.				
		(Continued) + <b>Document Review</b>				
		Nalik Estate: Document review			√	
		Interview with Stakeholder:			•	√
		Spraying Team, Labour Union,				
		women representative, contractors,				
		etc.				
	12.00 - 14.00	Lunch				
	14.00 - 15.00	Preparing Closing Meeting Report	√	<b>√</b>	√	√
	15.00 - 16.00	Closing Meeting	√	<b>√</b>	√	√
Thursday,	05.50 - 08.15	Flight Kavieng – Port Moresby	$\checkmark$	$\sqrt{}$	$\sqrt{}$	√
12/02/2015	14.25 – 18.45	Flight Port Moresby - Singapore	√	<b>√</b>	√	

<sup>\*)</sup> Technical Expert

Samplings taken are based on RSPO formula: 0.8√n where n is number of Units:

- 2 estates (Kara and Nalik estate)
- 32 smallholders interview
- 2 blocks smallholder plantation (West and South Area)



## Appendix "D" Abbreviation used

BOD Biological Oxygen Demand BSI British Standard Institution CLUA Clan Land Use Agreement

CPO Crude Palm Oil

DEC Department of Environment and Conservation
DLIR Department of Labour and Industrial Report

EFB Empty Fruit Bunch FFB Fresh Fruit Bunch

FSC Forestry Stewardship Council GPS Global Positioning System HCV High Conservation Value IPM Integrated Pest Management

IRCA International Registration of Certified Auditors

ISO International Standards Organisation

KER Kernel Extract Ratio
MSDS Material Safety Data Sheet
NBPOL New Britain Palm Oil Limited

NIOPGA New Ireland Oil Palm Growers Association.

OER Oil Extract Ratio

OHS Occupational Health and Safety
OPIC Oil Palm industry Corporation
PAF Planting Approval Form

PK Palm Kernel
PKO Palm Kernel Oil
PKE Palm Kernel Expeller

PPE Personal Protective Equipment

PNGOPRA Papua New Guinea – Oil Palm Research Association

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
QMS Quality Management System
RSPO Roundtable Sustainable Palm Oil

RTEs Rare, Threatened and Endangered Species

SHA Smallholder Affair

SIA Social Impact Assessment SOP Standard Operation Procedure