

PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

## MALAYSIAN SUSTAINABLE PALM OIL - ANNUAL SURVEILLANCE ASSESSMENT 1 Public Summary Report

### **Keresa Plantations Sdn Bhd**

Client company Address: Level 5, Tun Jugah Tower, No. 18, Jalan Tunku Abdul Rahman 93100 Kuching, Sarawak, Malaysia

> Certification Unit: Sg Kubud Estate

Location of Certification Unit: Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia

### Report prepared by: Muhammad Fadzli b. Masran (Lead Auditor)

### Report Number: 3293327

### **Assessment Conducted by:**

BSI Services Malaysia, (DSM Accreditation Number: MSPO 09112018 CB 12) Suite 29.01 Level 29 The Gardens North Tower, Mid Valley City Lingkaran Syed Putra, 59200 Kuala Lumpur Tel +60392129638 Fax +60392129639 www.bsigroup.com

## MSPO Public Summary Report Revision 1 (Feb 2020)

#### **TABLE OF CONTENTS** Page No 1.1 1.2 1.3 1.4 Certified Area ......4 1.5 Plantings & Cycle ......4 1.6 Certified Tonnage of FFB ......4 1.7 Uncertified Tonnage of FFB......4 1.8 Certified Tonnage ......4 1.9 Actual Sold Volume (CPO)......5 1.10 Actual Sold Volume (PK)......5 2.1 2.2 2.3 3.4 Summary of the Nonconformities and Status......16 3.5 Issues Raised by Stakeholders ......16 Appendix D: Location and Field Map ...... 67

### Section 1: Executive Summary

1.1 Organizational Information and Contact Person						
Company Name	Keresa Plantations Sdn. Bhd.	Keresa Plantations Sdn. Bhd.				
Mill/Estate	MPOB License No.	MPOB License No. Expiry Date				
Mill/Estate	503656102000	503656102000 28/02/2021				
Address	Lot 1, Block 17, Lavang Land D	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia				
Certification Unit	Sg Kubud Estate					
Contact Person Name	A.K Kumaran					
Website	www.keresa.com.my	www.keresa.com.my E-mail kumaran@keresa.com				
Telephone	012-8855870/74	F	acsimile	N/A		

1.2 Certification Information						
Certificate Number	MSPO 702700					
Issue Date	17/06/2019	L7/06/2019         Expiry date         16/06/2024				
Scope of Certificatio	n Production of Susta	Production of Sustainable Oil Palm Fruits				
Standard	MS 2530-3:2013 P smallholders	MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders				
Stage 1 Date		26/10/2018	26/10/2018			
Stage 2 / Initial Asse	essment Visit Date (IAV)	17-18/04/2019				
Continuous Assessm	ent Visit Date (CAV) 1	28/08/2020 (Remote) & 24/09/2020 (On-site)				
Continuous Assessm	ent Visit Date (CAV) 2	ТВА				
Continuous Assessm	ent Visit Date (CAV) 3	ТВА				
Continuous Assessm	ent Visit Date (CAV) 4	ТВА				
Other Certificati	ons					
Certificate Number	Standard(	Standard(s)		Issued by	Expiry Date	
N/A	N/A		N//	A	N/A	

1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address	GPS Reference of the site office				
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Longitude	Latitude			
Sg Kubud Estate	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia	113.46151	3.11154			



## MSPO Public Summary Report Revision 1 (Feb 2020)

1.4 Certified Area								
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted			
Sg Kubud Estate	3,204.17	125.93	196.00	3,526.10	90.87%			
TOTAL	3,204.17	125.93	196.00	3,526.10				

### 1.5 Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
Sg Kubud Estate	0.00	3,204.17	0.00	0.00	0.00	3,204.17	0.00
Total (ha)	0.00	3,204.17	0.00	0.00	0.00	3,204.17	0.00

1.6 Certified Tonnage of FFB						
		Tonnage / year				
Estate	Estimated (Apr 2019 - Mar 2020)	Actual (Apr 2019 - Aug 2020)	Forecast (Apr 2020 - Mar 2021)			
Sg Kubud Estate	65,407	86,464.32	65,196			
Total	65,407	86,464.32	65,196			

1.7	Uncertified Tonnage of FFB
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	Tonnage / year				
Estate	Estimated (Apr 2019 - Mar 2020)	Actual (Apr 2019 - Aug 2020)	Forecast (Apr 2020 - Mar 2021)		
N/A	N/A	N/A	N/A		

### 1.8 Certified Tonnage

	Estimated	Actual	Forecast
Mill Capacity	FFB	FFB	FFB
Mill Capacity: N/A	N/A	N/A	N/A
	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)
SCC Model:	N/A	N/A	N/A
N/A	PK (KER: %)	PK (KER: %)	PK (KER: %)
	N/A	N/A	N/A

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## PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

1.9 Actual Sold Volume (CPO)						
	MSPO Certified	Other Schemes Certified		Conventional	Total	
CPO (MT)	MSPO Certifieu	ISCC	RSPO	Conventional	iutai	
N/A	N/A	N/A	N/A	N/A	N/A	

1.10 Actual Sold Volume (PK)								
DK (MT)	MSPO Certified	Other Schei	mes Certified	Conventional	Total			
PK (MT)	MSFOCEItheu	ISCC	RSPO	Conventional	Total			
N/A	N/A	N/A	N/A	N/A	N/A			



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

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

#### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted on 28/8/2020 for Partial Remote Assessment and onsite on 24/9/2020. The audit programme is included as per item 2.3: Assessment Plan. The approach to the audit was to treat the Sg Kubud Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, 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 and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Sungai Kubud Estate	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$

### Tentative Date of Next Visit: September 1, 2021 - September 2, 2021

**Total No. of Mandays: 2** 

#### 2.1 BSI Assessment Team

Team Member Name	<b>Role</b> (Team Leader or Team member)	<b>Qualifications</b> (Short description of the team members)
Muhammad Fadzli Masran	Team Leader	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Vijay Kanna Pakirisamy	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Mill best practices, Estate best

## MSPO Public Summary Report Revision 1 (Feb 2020)

		practices, workers welfare, stakeholder consultation, social, long-term economic viability.
Muhamad Naqiuddin Mazeli	Team Member	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health estate best practices, workers welfare, social, long-term economic viability.

### 2.2 Accompanying Persons

No.	Name	Role
N/A	N/A	N/A

### 2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Partial Remote Assessment:

Date	Time	Subjects	MNM
Friday 28/08/2020	08:30 - 09:00	<ul> <li>Opening Meeting</li> <li>Presentation by BSI Lead Auditor - introduction of team member and assessment agenda</li> <li>Confirmation of assessment scope and finalizing audit scope</li> </ul>	$\checkmark$
	09:00 - 12:30	Sg Kubud Document Review (MS 2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices and P7: Development of New Planting	$\checkmark$
	12:30 - 13:30	Lunch break	
	13:30 - 16:30	Continue Document review (MS:2530 Part 3), P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition.	√
	16:30 - 17:00	Closing meeting	$\checkmark$

On-site assessment:

Date	Time	Subjects	MFM	VKP
Thursday 24/09/2020 Sg. Kubud	08.30 - 12.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing	$\checkmark$	V
Estate		area, Schedule waste management, worker housing, clinic, Landfill etc.		
		Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement		
		P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices,		
	12.00 - 12.30	P7: Development of New Planting (if any)	$\checkmark$	$\checkmark$



## PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

Friday 25/09/2020	16.00 - 16.30	Preparation of audit report	V	$\checkmark$
Keresa POM				
	16.30 - 17.00	Closing Meeting	$\checkmark$	$\checkmark$

### **Section 3: Assessment Findings**

### 3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- □ MSPO MS 2530-2:2013 General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders

□ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were no Major & no Minor nonconformities raised. The Sungai Kubud Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

Major/Minor Nonconformities:			
Ref:	Area/Process:	Clause:	
	Issue Date:	Due Date:	
Requirements:	No nonconformities raised		
Statement of Nonconformity:			
Objective Evidence:			
Corrections:			
Root cause analysis:			
Corrective Actions:			
Assessment Conclusion:			

### **Noteworthy Positive Comments**

N/A

## **MSPO Public Summary Report** Revision 1 (Feb 2020)

### 3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:			
Ref:	Area/Process: Sg Kubud Estate	Clause: 4.5.6.3	
1767946-201903-M1	Issue Date: 18/4/2019	Due Date: 17/6/2019	
Requirements:	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.		
Statement of Nonconformity:	Management plan for HCV was not effectively implemented.		
Objective Evidence:	i) Latest inspection was carried out on 15/3/19 for riparian zone monitoring. Other monitoring under HCV 1.2 – related to sightings records detailed out species (location and time) was not effectively recorded.		
	ii) No continuous education and awareness pro endangered species for staff/workers/stakeholde		
Corrections:	1. To conduct HCV awareness training.		
	2. To improve HCV monitoring process.		
Root cause analysis:	The Estate Management ignorant on HCV matters on appointment of PIC and training awareness.		
Corrective Actions:	1. To officially appoint HCV Representative for Sg. Kubud Estate.		
	2. Continuous and collaboration with Forest Department on enhancing knowledge on endangered species.		
Assessment Conclusion:	Implemented evidences verified as per the following:		
	i) HCV training was carried out on 26/4/19 targetted for the HCV monitoring		
	ii) Official appointment of HCV representative, Senior Estate Manager dated 29/4/19 signed by Assistant General Manager.		
	iii) Invitation letter to Forest Department, dated 30/4/19 was sighted. The intent is to learn and identify (flora and fauna) species which are categorized as Rare, Endangered, and Threatened (RTE). This is the first invitation sent to Forest Department.		
	The major NC is closed on 29/5/19. Continuous in the next assessment.	implementation will be further verified	
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the major NC was effectively closed.		

Major Nonconformities:			
Ref:	Area/Process: Sg Kubud Estate	Clause: 4.4.4.2 (d)&(e)	
1767946-201903-M2	<b>Issue Date:</b> 18/4/2019	<b>Due Date:</b> 17/6/2019	
Requirements:	The occupational safety and health plan should cover the following:		
Requirements.	d) The management shall provide the appropriate PPE at the place of work to cover		

dous operations as identified in the risk assessment and control tification, Risk Assessment and Risk Control (HIRARC). shall establish Standard Operating Procedure for handling of proper and safe handling and storage in accordance to
proper and safe handling and storage in accordance to
Health (Classification Packaging and Labeling) Regulation 1997
fety Health (Use and Standard of Exposure of Chemical
) Regulation 2000
was not provided at the place of work to cover all potentially s.
tainer is not in accordance with USECHH 2000 regulation.
for manuring gang [safety glass, nitrile glove and N95 respirator] nendation dated 20/3/19. Observed at field SK1404, incomplete
used by the manuring gang. No nitrile glove and safety glass ther trailed on the PPE issuance record dated 19/3/19, only apron ing gang.
st aid item is incomplete. No hazard label found on the relabeled
to all manuring gang in the estate.
licine/solution will be labelled with an informative sticker including ad updated to all first aid kit available at Sg. Kubud.
t on procedure of PPE issue to the manuring gang.
ked/failed to notice container relabelling.
PE issue form record for each group of workers according to type nuring, spraying and harvesting.
on on weekly basis at muster. PPE which is in bad condition due to I be replaced accordingly by Estate management
or mecidine packaging specifically for Keresa Plantations Sdn Bhd acun 1952 under regulation 8,9 and 12. Using Standard Exposure to Health (USECHH) 2000 as a guidelines.
ces verified as per the following:
ainer was verified (before and after) was evident. New hazard sign sed for relabelling.
packaging dated 24/4/19 was verified and has included all relevant vement.
n and PPE issuance records were verified. Latest records dated
ed on 29/5/19. Continuous implementation will be further verified
ent.

## PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

Major Nonconformities:			
Ref:	Area/Process: Sg Kubud Estate	Clause: 4.6.1.1	
1767946-201903-M3	Issue Date: 18/4/2019	Due Date: 17/6/2019	
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of	Standard operating procedures on the FFB evacu	uation/transportation was not	
Nonconformity:	appropriately documented		
Objective Evidence:	Observed FFB truck/lorry transporting FFB from Sg Kubud to Keresa POM over stacked the layer of FFB for more than 2 layer @ 2 feet. Further trailed on the SOP, no guideline or procedure on the maximum loading/stacking of FFB for the FFB truck/lorry.		
Corrections:	To prepare SOP/procedure for FFB loading/stacking and transportation to POM.		
Root cause analysis:	PIC is ignorant on safety in transportation.		
Corrective Actions:	To design an awareness training to lorry/tractor drivers		
Assessment Conclusion:	Implemented evidences verified as per the following:		
	i) SOP for FFB transportation has been established and include the maximum layer of FFB stacking and canvas/netting fixing. Other related safety precaution also incorporated in the SOP.		
	ii) Latest training was given to lorry and tractor driver on 3/5/19. This to update the new safety guidelines for FFB transport.		
	The major NC is closed on 29/5/19. Continuous i in the next assessment.	mplementation will be further verified	
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the major NC was effectively closed.		

Major Nonconformities:				
Ref:	Area/Process: Sg Kubud Estate	Clause: 4.3.1.1		
1767946-201903-M4	<b>Issue Date:</b> 18/4/2019	<b>Due Date:</b> 17/6/2019		
Requirements:	All operations are in compliance with the applica international laws and regulations	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations		
Statement of Nonconformity:	Compliance to the certain legal requirement are not effectively demonstrated.			
Objective Evidence:	Medical Assistant for Sg Kubud Estate (Hudson Anak Dominic) didn't have the current Surat Perakuan Tahunan for 2019. This is not comply with Akta 180 AKTA PEMBANTU PERUBATAN (PENDAFTARAN) 1977:			
	11. (2) Sesuatu permohonan untuk membaharui perakuan itu hendaklah dibuat tidak lewat daripada 30 haribulan September tiap-tiap satu tahun dan Lembaga hendaklah memberikan keputusan mengenainya dan membaharui atau enggan membaharui perakuan itu dan hendaklah dalam salah satu hal menyampaikan keputusannyakepada			

...making excellence a habit." Page 14 of 69

MSPO Public Summary Report Revision 1 (Feb 2020)

	orang yang berkenaan itu tidak lewat daripada 30 haribulan November dalam tahun yang sama.
Corrections:	To apply for "Pembaharuan Perakuan Tahunan Pembantu Perubatan" from LembagaPembantu Perubatan Kementerian Kesihatan Malaysia.
Root cause analysis:	Medical Assistant lack of knowledge/awareness about the 'Surat Perakuan tahunan for 2019'.
Corrective Actions:	i) To prepare legal requirement checklist to ensure compliance.
	ii) Medical Asisstant need to have close contact with Medical officer at Hospital Bintulu or Klinik Kesihatan Tubau.
	ii) Monthly update information from official website of "Bahagian Amalan Perubatan Kementerian Perubatan Malaysia (http://medicalprac.moh.gov.my) and from Malaysian Association of Medical Assistants (http://www.pppmalaysia.com/).
Assessment Conclusion:	Implemented evidences verified as per the following:
	i) Application for annual renewal of practitioner license was sighted and approved on 16/4/19.
	ii) Legal compliance checklist was evident, check and proved by estate manager.
	The major NC is closed on 29/5/19. Continuous implementation will be further verified in the next assessment.
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the major NC was effectively closed.

Major Nonconformities:			
Ref:	Area/Process: Sg Kubud Estate	Clause: 4.4.2.2	
1767946-201903-M5	<b>Issue Date:</b> 18/4/2019	<b>Due Date:</b> 17/6/2019	
Requirements:	The system shall be able to resolve disputes in manner that is accepted by all parties.	an effective, timely and appropriate	
Statement of Nonconformity:	Complaint & grievance system is not resolve in t	imely manner.	
Objective Evidence:	<ul> <li>The complaint &amp; grievance process flowchart is available however, there is no specific timeline to resolve the issue.</li> <li>The respond to the complaint also not solving the issue, ie: all the 6 complaints lodged regarding 'clean water supply is not available' in 2018 and the management responded that 'it will be solved next year in 2019 where the budget is allocated'.</li> </ul>		
	Apart from that, for long house native people, the raised however, there is no solution provided by	-	
Corrections:	1. Improve available SOP complaint and grievan	ce timeline to resolve the issue.	
	2.To improvise existing long house logbook.		
	3. To do correction on respond toward complain	ts regarding water issue.	
Root cause analysis:	PIC had given only long term solution on water complaints & grievances procedure.	supply issues. There is no timeline in	

Corrective Actions:	<ol> <li>As approved by top management, the estate management will construct Water treatment Plant's project as stated in Sg. Kubud Capital Expenditure 2019.</li> <li>Senior management selected the site for construction of water treatment plant.</li> </ol>
Assessment Conclusion:	Implemented evidences verified as per the following:
	i) SOP for complaints and grievance has been updated. SOP version 2.0 dated April 2019 was verified. Timeline to resolve the issue.
	ii) Sighted the approved budget for water treatment plant under Capital Expenditure 2019. The plan will be realized by end of 2019.
	The major NC is closed on 29/5/19. Continuous implementation will be further verified in the next assessment.
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the major NC was effectively closed.

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1767946-201903-M1	Major	18/4/2019	Closed
1767946-201903-M2	Major	18/4/2019	Closed
1767946-201903-M3	Major	18/4/2019	Closed
1767946-201903-M4	Major	18/4/2019	Closed
1767946-201903-M5	Major	18/4/2019	Closed

### **3.5 Issues Raised by Stakeholders**

Stakeho	olders comment
1	Feedbacks:
	K.C. Chan (Contractor) – They have very good repo with Keresa's Management. Payments are all done in a timely manner. The management often includes them in all stakeholder meetings.
	Management Responses:
	Positive comments noted.
	Audit Team Findings:
	No further issue.
2	Feedbacks:
	Tielo (Canteen Operator) – Management supports the canteen business and aids with any assistance when required.
	Management Responses:
	Positive comments noted.
	Audit Team Findings:

	No further issue.
3	Feedbacks:
	Wagro (Chemical Supplier) – Wagro has been doing business as a chemical supplier with Keresa Plantation for many years. They have a very good understanding between the two organisations. All payments are done in a timely manner.
	Management Responses:
	Positive comments noted.
	Audit Team Findings:
	No further issue.
4	Feedbacks:
	TK Majong (Tuai Rumah) – Keresa Plantation has provided a lot of assistance to the neighbouring communities as and when required such as providing water tanks and machineries for works done at the villages.
	Management Responses:
	Positive comments noted.
	Audit Team Findings:
	No further issue.
5	Feedbacks:
	Wong Yuk Zung (Contractor) - They have very good repo with Keresa's Management. Payments are all done in a timely manner. The management often includes them in all stakeholder meetings.
	Management Responses:
	Positive comments noted.
	Audit Team Findings:
	No further issue.



### Section 4: Assessment Conclusion and Recommendation

and the second	lity and Formal Sign-off of Assessment Findings		
	ai Kubud Estate Certification Unit complies with the MS 2530- t the certification of Sungai Kubud Estate Certification Unit is		
Acknowledgement of Assessment Findings Report Prepared by			
Name: A.K.Kumaran	Name: Muhammad Fadzli Masran		
Company name: Keresa Plantations Sdn Bhd	Company name: BSI Services Malaysia Sdn. Bhd.		
Title: General Manager	Title: Client Manager		
Signature:	Signature:		
Date: 14/12/2020	Date: 30/11/2020		



## PF824 **MSPO Public Summary Report** Revision 1 (Feb 2020)

### Appendix A: Summary of the findings by Principles and Criteria

Criterio	n / Indicator	Assessment Findings	Compliance
4.1 Princ	iple 1: Management commitment & responsibility		
Criterio	<b>n 4.1.1 –</b> Malaysian Sustainable Palm Oil (MSPO) Policy		
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by Keresa Plantation Senior Group General Manager dated April 2015.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement Major compliance -	The established policy has emphasized on the commitment to sustainable development and continuous improvement with the objective of improving the milling and estate operation.	Complied
Criterio	<b>n 4.1.2</b> – Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 1; Effective date: 27.09.2016) was established. The internal audit need to be conducted annual.	Complied
	- Major compliance -	Annual MSPO internal audit was carried on 21 May 2020 by SCD unit. Audit covered both documentation and field operation for the mill and estates. There were 3 major 1 minor NCs raised by the internal auditors and still in the process of closure. Audit report was made available for review.	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	As per verification on the SOP of internal audit, no changes since previous year. Internal audit procedure (KERESA/MSPO/QP-10; Rev 1; Effective date: 27/09/2016) was established and effectively	Complied

## MSPO Public Summary Report

## Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action Major compliance -	implemented. The procedure was reviewed by the management to include the competency requirement for MSPO internal auditor.	
4.1.2.3	Report shall be made available to the management for their review Major compliance -	The report was available, Internal audit report dated 21/5/2020 was made available for management review. The corrective action plan was update and available (ref. no. MSPO/SK/IA-CAP/NC02)	Complied
Criterion	4.1.3 – Management Review		<u> </u>
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The Management Review Procedure (First Editions; Version 1.0) dated September 2015 was established. MSPO Management Review was carried out on 21 May 2020 and complete on 4/6/2020. Minute Meeting of Management Review MSPO was available. All pertinent elements for MSPO implementation has been reviewed and presented to top management.	Complied
Criterion	4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.	TQM has worked with estate to review and update the social and environmental aspects and impacts risk registers and to develop improvement plans.	Complied
	- Major compliance -	Continual improvement plan dated January 2020 is referred to. Improvement plan for pertinent key values on (economic, social and environmental) has been identified for improvement. For example, On Community is to improve recording of benefits/investment in community, to have Smallholder certification pilot initiative (POPSI) and establish road & fertilizer subsidy / support mechanism.	

## MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	<ul> <li>Adaptation of fully mechanized operation is still in progress to be completed by phases. For upkeep and maintenance, day to day operation is still manually handle by workers.</li> <li>An iECS Checkroll System has been introduced in Jiba Estate and Sujan Estate to replace the previous Manual Checkroll System.</li> <li>The advantages of iECS Checkroll System is to benefit the company as follows: <ul> <li>Increase in Data Entry &amp; Processing efficiency.</li> <li>Reduce the need for physical Input Forms (Reduce Cost)</li> <li>Fast check roll processing at the month end.</li> <li>Efficient information monitoring and tracking.</li> </ul> </li> </ul>	Complied	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	The estate has appointed the assistant manager as in charge person to implement and monitor any new technologies being implemented and training of other personnel's. Action is documented under document named Continuous Improvement Plan dated 1/1/2020 by SCD. Most of the action plan is still on going and time frame for completion is being monitored by the person in charge.	Complied	
4.2 Princi	ple 2: Transparency			
Criterion	Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or	Keresa Plantation has communicated the information regarding MSPO and all information requested to the internal and external stakeholder through, JCC meeting, stakeholder consultation and website:	Complied	



## MSPO Public Summary Report Revision 1 (Feb 2020)

#### **Criterion / Indicator Assessment Findings** Compliance disclosure that could result in negative environmental or social www.keresa.com.mv, complaint form, and suggestion box and workers monthly dialogue. outcomes. - Major compliance -Also management has publically publish the policies at the company office and notice boards. 4.2.1.2 Management documents shall be publicly available, except Records of request for information maintained under file Action Complied where this is prevented by commercial confidentiality or where Request. Most of the requests are internal i.e. housing repair request disclosure of information would result in negative environmental by the workers raised during JCC Meeting. or social outcomes. In general all the documents are available upon request. - Major compliance -Criterion 4.2.2 - Transparent method of communication and consultation KERESA Plantations Sdn. Bhd. have established Procedures for 4.2.2.1 Complied Procedures shall be established for consultation and Communication of Social Policies (Chapter 3, Reference No: SOC 3.1, communication with the relevant stakeholders. Date issue: Dec 2009, Version 1) and Complaints & Grievances - Major compliance -Procedure (Reference No: SOC 3.2, Version 1) that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders. The procedure outlines the process of communication on the social policies, lodging grievances and monitoring implementation. The Standard Operating Procedure has identified mechanisms for consultation and communication with the relevant stakeholders. Sq. Kubud Estate have implemented the "Communication and Consultation Management Guidelines" as evidenced by the maintenance of filing systems for recording written requests for

## **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
		<ul> <li>assistance and information. Sighted the file for Workers Complaints available at the estates.</li> <li>Regular communication with stakeholders was done through organized meetings. Sighted the meeting minutes as below: <ol> <li>Workers Monthly Dialogue: 17.07.2020</li> <li>Workers Monthly Dialogue: 26.02.2020.</li> <li>Meeting with 'Tuai – Tuai Rumah' (Heads of Long Houses) – 23.01.2020</li> <li>Meeting with Contractors – 05.06.2020</li> </ol> </li> <li>The Estate has shown a good communication, by publishing the flow chart of Procedure "Pengurusan Aduan Pekerja/Stakeholder" at the notice board in front of estate office and housing complex. The feedback can be forwarded to the estate management or to Suggestion Box located at the muster ground and office.</li> </ul> Interviews with Stakeholders confirmed that both estates have an open approach to communication with staff, workers and local communities.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	The management has appointed Ms. Suzella Demie (Sustainability and Compliance Executive) as the Communication Representative for the mill as stated in the appointment letter as Social Management Representative dated 17 <sup>rd</sup> February 2020 undersigned by the Assistant General Manager – Operations/Sustainability.	Complied



## MSPO Public Summary Report Revision 1 (Feb 2020)

#### **Criterion / Indicator Assessment Findings** Compliance 4.2.2.3 Complied List of stakeholders, records of all consultation and Stakeholder register is available including the internal and external communication and records of action taken in response to input such as Ketua Kampong, canteen, MPOB, DOE, DOSH, contractors, etc from stakeholders should be properly maintained. as at 23.3.020. Stakeholder meeting was conducted on 23.02.2020. - Major compliance -Criterion 4.2.3 – Traceability 4.2.3.1 The management shall establish, implement and maintain a Keresa Plantations Sdn Bhd has the Traceability Procedure for FFB Complied standard operating procedure to comply with the requirements (Doc No: SOP/MSPO/KPSB/SG.KUBUD Rev 1 dated 01.03.2019). for traceability of the relevant product(s). - Major compliance -4.2.3.2 The management shall conduct regular inspections on The regular inspection on the traceability system was conducted Complied compliance with the established traceability system. through traceability inspection annually. Sighted the traceability inspection was conducted on 14/08/2020 at Sq Kubud by Senior SCD - Major compliance executive. Among the criteria checked are FFB driver daily collection bunch, no and weight. 4.2.3.3 The management should identify and assign suitable The management has appointed Ms. Alicesa Anak Ramba Complied employees to implement and maintain the traceability system. (Sustainability & Compliance Executive) as the Traceability Representative for the estates as stated in the appointment letter - Minor compliance dated 17th February 2020 undersigned by the Assistant General Manager - Operations/Sustainability. 4.2.3.4 Records of sales, delivery or transportation of FFB shall be The FFB sales was recorded in Harvesting Summary file. Sighted the Complied maintained. FFB tractor Collection Chit (from field to ramp) and FFB Driver Lorry Chit (from ramp to mill) for the FFB traceability record. The data was - Major compliance monitored in Harvesting Summary file which contain the information of time, detail collection of bunches, estimated weight, harvester

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## PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
		number, and tractor/lorry number. The data was verified to date July 2020 with total 5735.75 MT.	
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 — Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	Sg Kubud Estate has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations.	Complied
		Sample of permit and license sighted at Sg Kubud Estate were :	
		1. MPOB license for nursery 51606611000 valid until 31/10/2021	
		2. MPOB license for FFB 50365610200 valid until 28/2/2021	
		3. Trading license from LHDN license no 993508 valid until 14/4/2021	
		4. Diesel license from KPDNKK (BTU.P.02/2020(D)) valid until 29/1/2021	
		5. Petrol license form KPDNKK (SPL00005) valid until 31 Dec 2020	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	A Legal Compliance procedure has been established (KP 16 Mechanism for ensuring legal compliance dated 15 Mar 2010). All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. TQM sustainability department have reviewed and evaluated the LORR on 12/4/19. All the new legal requirements were include in the legal register accordingly:	Complied

## MSPO Public Summary Report Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ul> <li>i) Minimum Wages Order 2020</li> <li>ii) Akta Pencegahan dan Pegawalan Penyakit Berjangkit 1988</li> <li>iii) Movement Control Order 2020</li> </ul>	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	The person in charge responsible to monitor compliance and to track and update the changes in regulatory requirements is Sustainability & Compliance Executive, Ms Julia Ak Andrew Kere. Refer to appointment letter dated 17/2/2020.	Complied
Criterio	n 4.3.2 — Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The estate lands were leased by the company with NCR land. Interview with the surrounding communities and stakeholders confirm that there is no land dispute.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	Sg Kubud Estate was under the Native Customary Rights (NCR) land in Sarawak. Sighted the agreement as below:	Complied
	- Major compliance -		

## **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		1. Letter from Keresa Plantations Sdn Bhd to Ybhg Datu Jaul Samion, Setiausaha Tetap, Kementerian Kemajuan Tanah, dated 06 November 2012 stating the lease of NCR land of Rh. Iba, Sungai Sujan, Pandan.	
		2. Letter from settlers of Rh. Iba, Sg. Sujan, Pandan to Ybhg Datu Jaul Samion, Kementerian Kemajuan Tanah, dated 17 October 2012 stating the willingness of Rh Iba to allow Keresa Plantations Sdn Bhd to develop their NCR and ancestral land for a period of 30 years.	
		Memorandum of agreement and supplementary agreement with the 2 long houses dated December 2011, August 2012 and September 2012. No changes from previous audit.	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Legal boundary was clearly demarcated with wooden pole. Sighted the boundary marking no. 543 (03° 07' 20.90" N, 113° 28' 48.40"E) at field SK1401 adjacent to Grand Perfect (Acacia Planting).	Complied
	- Major compliance -		
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed concept (EPIC)	No changes from the previous assessment. Keresa Plantation has leased the NCR land and able to provide the agreement between management and native people. Sighted also the payment list to all native people: Land Owner Lot Survey, Phase 1 (A) 2012 planting.	Complied
	with free prior informed consent (FPIC) Minor compliance -	For FPIC, management will use procedure: Complaints & Grievance Procedure with ref. no. SOC 3.2 dated December 2009, Version 1.0. More details provided in 4.4.2.1	



## PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	Estate has the memorandum of agreement with the native people as the land is belonged to NCR land.	Complied
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Map of the location, total perimeter and hectare agreed was available together with the supplementary agreement.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Sg Kubud Estate was under the Native Customary Rights (NCR) land in Sarawak. Sighted the agreement as below:	Complied
		1. Letter from Keresa Plantations Sdn Bhd to Ybhg Datu Jaul Samion, Setiausaha Tetap, Kementerian Kemajuan Tanah, dated 06 November 2012 stating the lease of NCR land of Rh. Iba, Sungai Sujan, Pandan.	
		2. Letter from settlers of Rh. Iba, Sg. Sujan, Pandan to Ybhg Datu Jaul Samion, Kementerian Kemajuan Tanah, dated 17 October 2012 stating the willingness of Rh Iba to allow Keresa Plantations Sdn Bhd to develop their NCR and ancestral land for a period of 30 years.	
		Memorandum of agreement and supplementary agreement with the 2 long houses dated December 2011, August 2012 and September 2012. No changes from previous audit.	
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	byment condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		

## **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	SIA for Sg Kubud Estate was conducted together in other Keresa Mill and Estate. The management plan was reviewed Jan 2020. Among the issues captured were:-	Complied
		1) Issue regarding road from Long house or smallholder area to Keresa Mill was bad, the action been taken on 29/1/2020.	
		The stakeholder meeting last conducted was on 23/1/2020. Some issue was been raised by stakeholder and management has replied accordingly.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	Keresa Plantations Sdn. Bhd. has established a Complaints & Grievance Procedure with ref. no. SOC 3.2 dated December 2009, Version 1.0.	Complied
	- Major compliance -	Any complaints can be lodged through complaint box, email or in writing or reported to supervisor/manager directly. The procedure has briefed to the internal workers and external stakeholders.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.	Inspection of records at the estates indicated that written communications were replied promptly, and the correspondence are kept in a file (File Aduan & Cadangan Pekerja). Complaints forms seen	Complied
	- Major compliance -	are responded and completed within 5 working day.	
		Sighted samples of complaints as below;	
		1. Date: 10.03.2020	
		Name: Jarudin	

## **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		Request: Suggestion to organize football, volleyball and the of war competition.	ug
		Management Response: To be postponed due to the MCO	
		2. Date: 06.08.2020	
		Name: Saharudin:	
		Request: Request to resume Friday Prayers at the Surau.	
		Management Response: Friday prayers can be resumed in month of September in accordance with the RMCO SOP.	he
4.4.2.3	<ul> <li>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</li> <li>Minor compliance -</li> </ul>		nd Complied is ire
		The management have also made available a suggestion box at muster ground for the workers and relevant stakeholders to write th complaints or suggestions. The written complaints or suggestions recorded in a log book for further action to be taken by management.	eir Ire
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	Employees & Stakeholders are made aware that the complaints suggestions can be made at any time to the management. They frequently reminded during the meetings conducted with the work representatives and leaders of the long houses.	ire Complied
	- Minor compliance -	representatives and leaders of the long houses.	



## MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings		Compliance
		communities, it was understood the	ne employees and surrounding nat they are aware that complaints ne and the modes available for them gestions.	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	24 months in accordance to the Co	s and resolution records for the last omplaints & Grievances Procedures. ances File consist of records for the	Complied
Criterio	<b>n 4.4.3:</b> Commitment to contribute to local sustainable develo	opment		
4.4.3.1	Growers should contribute to local development in consultation with the local communities.		uted to local development. The iternal and external stakeholders. ions are as follows: -	Complied
	- Minor compliance -	External Stakeholder	Internal Stakeholder	
		07.07.2020 Assisted the Rumah Panjang by providing Estate Backhoe for the use of Road Works at their area.		
		07.07.2020 Assisted the Rumah Panjang Eba by constructing roads and		

## PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

Criterior	n / Indicator	Assessment Findings	Compliance
		providing stones for the roads leading to their Oil Palm Farms.	
		30.06.2020 Provided 32 units of Water Tanks to Rumah Lichong (Longhouse) amounting to RM 17, 280.00.	
Criterio	1 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented Major compliance -	Keresa Plantation Sdn. Bhd. has established Occupational Sa Health Policy signed by the Managing Director dated 17/10/ the policy stated the company commitment to ensure and pro- safety work environment for the workers and operations. The was communicated through training, briefing and displayed of board.	2017. In mote the he policy on notice
		The estates visited has established safety and health plan covering on training, OSH audit, workplace inspection, OSH and etc.	
		Sighted the implementation of the Safety and Health Plan as	follows:
		<ol> <li>Latest CHRA for estates visited has been conducted 20/3, certified assessor with reg. no. HQ/16/ASS/00/33. Refer re HQ/14/ASS/00/343-2019/007. All the recommendation CHRA has been addressed by the estate.</li> </ol>	eport no.

## MSPO Public Summary Report

## Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings		Compliance
		17/1/2020	atedb17/7/2020, 14/4/2020 and	
			screening for sprayer on monthly was conducted by the Medical screening records for the month of	
4.4.4.2	The occupational safety and health plan shall cover the following:	- Keresa Plantations has the OSH p		Complied
	a) A safety and health policy, which is communicated and implemented.	to the staff and workers. On site supervisors managers ensure the implementation of it. Os reviewed dated Jan 2020.		
	b) The risks of all operations shall be assessed and documented.	<ul> <li>The risk for all operation was available under HIRARC, it's covered from activity office, harvesting until crop delivered. Reviewed one 24/3/2020.</li> </ul>		
	c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:			
	<ul> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>For chemical hazard, Chemical Hazard Risk Analysis (CHRA) e on 20/3/2019 (Ref. No: HQ/16/ASS/00/33-2019/007) by ESI S</li> <li>Sdn Bhd by Assessor (HQ/16/ASS/00/33).</li> </ul>		/00/33-2019/007) by ESI Sampling	
	ii. all precautions attached to products shall be properly observed and applied			
	d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as	available for reviewed. Sample train		
	identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).	Training	Date	
	e) The management shall establish Standard Operating	Spraying training	21/7/2020	
	Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation	Manuring training	14/7/2020	

## **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings		Compliance
1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	Waste management	21/7/2020	
<li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li>	HCV training record	21/7/2020	
must have knowledge and access to latest national regulations and collective agreements.		rkers base on recommendation by ighted the PPE issue records for	
g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.	harvester dated 10/8/2020 and sprayers dated 8/8/2020. Noted during site visit and interview session with the sprayers, the sprayers were given PPE such as Safety google, apron, nitrile gloves, half face mask (N95) and wellington boots. The understanding and awareness on the		
<ul> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> </ul>	Plantations SOP for handling of ch handling and storage in accordar	Kubud estate follows the Keresa emicals to ensure proper and safe nee to Occupational Safety Health	
<ul> <li>Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</li> </ul>	(Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemica Hazardous to Health) Regulation 2000. Noted during site visit and		
<ul> <li>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</li> </ul>		issuance of chemical were done as the chemical were stored in the SDS is available at the store.	
- Major compliance -	- At the estate, there is an appoint	ed OSH Coordinator (Sustainability nsible for organizing safety training,	
	by the Sr. Manager Sustainability	Safety and Health committee lead /Estate Operation. The committee employee representative from both eting on quarterly basis.	

## MSPO Public Summary Report Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		Latest meeting was conducted on 20/2/2020, 14/5/2020 and 6/8/2020	
		- Keresa Plantation has established Safe & Standard Operating Procedure for Oil Palm Plantations (SSOP) dated January 2011. (Doc ref KP2-5). Estate upkeep, crop evacuation, chemical and agrochemical management, transportation of workers, utilities management, pest control, highly toxic pesticides, working at height etc.	
		- First Aid training was done yearly basis, latest record conducted on 10/6/2020 by Medical Assistant.	
		- Accident records was available. JKKP 8 for 2019 reported on 17/1/2020. No accident happen in Sg Kubud estate.	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.	The management has established a policy on good social ethics regarding human rights such as Human Rights Policy dated 30.11.17, Equal Rights Policy dated 1st December 2009, Prevention of Sexual Harassment & Domestic Violence in the Workplace Policy dated 1st December 2009, Freedom of Association Policy dated 1st December	Complied
	- Major compliance -	2009, etc. has been signed off by Managing Director of the group.	
		The "Keresa Sustainability Policy" is displayed in notice boards inside the office as well as outside the office. The policy also publicly available through the official website: <u>http://www.keresa.com.my</u>	
		The policy has been communicated to all workers and stakeholders during morning muster briefings, displayed at strategic places such as	

## MSPO Public Summary Report Revision 1 (Feb 2020)

#### **Criterion / Indicator Assessment Findings** Compliance office and line sites and communicated during meetings with the workers and relevant stakeholders. Keresa Plantation Sdn. Bhd. has established Equal Rights Policy, signed The management shall not engage in or support discriminatory 4.4.5.2 Complied by Managing Director dated 1st December 2009 to ensure equal practices and shall provide equal opportunity and treatment opportunity and treatment regardless of race, colour, sex, religion, regardless of race, colour, sex, religion, political opinion, political opinion, nationality, social origin or any other distinguishing nationality, social origin or any other distinguishing characteristics. characteristics. - Major compliance -Inspection of a sample of pay records and interviews of staff and workers at the both estates did not identify any issues related to discrimination. There is a contract and agreement for staff and workers including 4.4.5.3 Management shall ensure that employees' pay and conditions Complied foreign workers and pay and conditions are documented and are in meet legal or industry minimum standards and as per agreed accordance with the industry minimum standard. Inspection of a Collective Agreements. The living wage should be sufficient to sample of employee contracts confirmed that terms and conditions are meet basic needs and provide some discretionary income based clearly outlined and have been signed by the worker. During the on minimum wage. interview with the staff and workers, it was confirmed that they are - Major compliance paid adequately in accordance with the legal and industry standards. Sampled Workers checked for Employment Agreement and Play Slips for the estate; 1. Worker ID: 10837 2. Worker ID: 10836 3. Worker ID: 10476 4. Worker ID: 10720 5. Worker ID: 10946

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### MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	<ul> <li>Sighted the sampled pay slip (June 2020, July 2020 &amp; August 2020) and employment contract of contractor worker for Yun Hoo Sdn Bhd available and comply with the minimum standards according: <ol> <li>Simon Anak Acai</li> <li>Uki Anak Nguang</li> <li>Roy Anak Sibi</li> </ol> </li> <li>All 3 workers had a valid employment contract and the payslips indicated they were paid in accordance with the minimum wages' requirements. No non-authorized deductions were made through the payslips. The workers have acknowledged receive of the salary through the payslips.</li> </ul>	Complied
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.	Keresa Plantation Sdn. Bhd. has a register of all staffs and workers at the premise. The detail includes full name, gender, date of birth, date joined and job title. The copy of passport and permit etc. were maintained in the employee's personnel files.	Complied
4.4.5.6	<ul> <li>Major compliance -</li> <li>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</li> <li>Major compliance -</li> </ul>	There are Employment Contracts for all staffs and workers including foreign workers. Pay and conditions are documented in the employment contract and are in accordance with the Minimum Wages Standards. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker for the respective estates and the management representatives.	Complied

### MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
		Sampled the contract agreements of the following workers in the estate.	
		1. Worker ID: 10837	
		2. Worker ID: 10836	
		3. Worker ID: 10476	
		4. Worker ID: 10720	
		5. Worker ID: 10946	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	Working hours is 8 hours a day from Monday to Saturday. The overtime offered is a maximum of 104 hours which is in accordance to Malaysian Law.	Complied
	- Major compliance -	Both estates maintain a checkroll book to record the worker's attendance during the morning muster. The muster book is available for verification.	
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations	The working hours and break time have been clearly stated in the Employment Contract.	Complied
	and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.	Sighted in the Contract Agreement the rate of overtime which is agreed by both parties.	
	- Major compliance -	There is no complaint received regarding payment or forced to work on overtime during site interview.	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Salary slips clearly shows the calculations of gross salary, all legal deductions and net salary of a worker. Workers interviewed confirmed	Complied

### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion	/ Indicator	Assessment Findings	Compliance
	- Major compliance -	that they are being paid in accordance with the minimum wage requirements.	
		Individual payslips were distributed to all workers on salary day. A copy of paylsip is also kept in the estate office.	
		Sampled the payslip for following workers;	
		1. Worker ID: 10837	
		2. Worker ID: 10836	
		3. Worker ID: 10476	
		4. Worker ID: 10720	
		5. Worker ID: 10946	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	Interviews with local and foreign workers indicated that they are satisfied with the standard of housing and facilities ptovided by Keresa Plantation. Electricity and water are provided without charges. Health Clinic has been provided for the employees and family members with free treatment.	Complied
	- Minor compliance -	Outturn incentive for daily attendance on the muster and incentive of contract extension for foreign workers if they renew for three year and above. Local employees have yearly bonus based on personal performance.	
		Due to the Covid 19 Pandemic all workers are provided with Emergency Allowance to help them during the crisis.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and	Residents at all estate housing have access to facilities established by the company, such as health clinic, sports field, community hall,	Complied

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### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion	n / Indicator	Assessment Findings	Compliance
	<ul> <li>facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</li> <li>Major compliance -</li> </ul>	<ul> <li>crèche, and places of worship. The estates provide electricity and water to all workers for free. Additional to that, all workers are given monthly emergency allowance due to the ongoing Covid-19 Pandemic to manage the crisis.</li> <li>The Medical Assistant conducts weekly Labourline and Housing Inspection at the Workers Quarters to ensure that the area is maintained at an acceptable standard. Sighted the weekly Labourline and Housing Inspection Records in both estates.</li> </ul>	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	The management establish a policy and provide the guidelines to prevent all forms of Sexual harassment, the policy of sexual harassment and domestic violence signed by Managing Director dated 01.12.2009 available and publicly showed in signboard.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.	Employees has the right to join any of union and management has the freedom of association policy signed by managing director dated 01.12.2009. In Sg Kubud Estate, employee has form their own committee (JCC) to discuss any issue related to worker's welfare. Sighted the latest minute meeting on 17.07.2020. Representative from all races in Indonesia is appointed by election.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not	Keresa Plantations have a Minimum Age Policy dated 1 December 2009 undersigned by the managing Director that states the commitment of the organization to ensure that the plantations and mill will not use child labour, those below the age of 18.	Complied

### MSPO Public Summary Report

#### Revision 1 (Feb 2020)

Criterior	n / Indicator	Assessment Findings	Compliance
	<ul> <li>interfering with their education. They shall not be exposed to hazardous working conditions.</li> <li>Major compliance -</li> </ul>	Inspection of a sample of personnel files at the estate's office confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.	
Criterior	<b>1 4.4.6:</b> Training and competency		Complied
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.	Sg Kubud estate has prepared a HSE Training Plan 2020 that lists the internal and external training courses scheduled for the year. In addition estate has a schedule of "on-the-job" training for the main tasks. The estate also maintained training records for individual staff and workers, including induction of new workers.	Complied
	- Major compliance -	Training carried out for 2020:	
		1. Company policies to Contractor on 5/6/2020	
		2. Complaint and grievances to workers and contractor on 5/6/2020	
		3. PPE training and environment training on 14/7/2020	
		4. Bufferzone, and triple rinsing training 21/7/2020	
		5. Spraying, PPE and emergency response training on 21/7/2020	
		a. SOP and SSOP for spraying	
		b. PPE Awareness	
		c. Warning label and signage	
		d. SSOP for vehicle, roads, service maintenance	
		e. SOP for first aid treatment	

Criterion / Indicator	Assessment Findings	Compliance
	f. River bufferzone awareness	
	g. SOP for pesticide handling and storage	
	h. SOP for triple rinsing and SDS	
	2. Harvester training dated 14/7/2020	
	a. SOP and SSOP for harvesting	
	b. PPE Awareness	
	c. Warning label and signage	
	d. SSOP for harvesting	
	e. SOP for first aid treatment	
	a. Warning label and signage	
	b. SOP for first aid treatment	
	c. River bufferzone awareness	
	3. Fertiliser application training dated 14/7/2020	
	f. SOP and SSOP for harvesting	
	g. PPE Awareness	
	h. Warning label and signage	
	i. SSOP for manuring	
	j. SOP for first aid treatment	
	d. Warning label and signage	
	e. SOP for first aid treatment	

Criterio	n / Indicator	Assessment Findings	Compliance		
		<ul><li>f. River bufferzone awareness</li><li>g. Scheduled waste handling</li><li>h. SOP for triple rinsing</li></ul>			
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	Sg Kubud estate has conducted training needs assessment prior to prepare the annual training plan for the year 2020 for all the employee groups including new and existing workers and staffs. Training programs are based on worker's competency requirements. Workers must be properly trained before assigned to the respective work units. On-site observation or assessment will be carried out by field staff and assistant to monitor training effectiveness. The estate has also conducted assessment to the training attendees to assess the effectiveness of the training conducted. Base on the results, training needs analysis was conducted to identify training requirement of the employees.			
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.	Continuous training program are planned and implemented covering all employees and contractors as per the documented training procedure.	Complied		
4.5 Prin	ciple 5: Environment, natural resources, biodiversity	and ecosystem services			
Criterio	Criterion 4.5.1: Environmental Management Plan				

### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	Keresa Plantations Sdn. Bhd. has an Environmental policy dated 27/12/2016 that has been signed by the Managing Director and environmental management plan with relevant to the applicable laws and regulations. Interviews of staff and workers found that the policy has been communicated and implemented	Complied
4.5.1.2	<ul> <li>The environmental management plan shall cover the following:</li> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations.</li> <li>- Major compliance -</li> </ul>	Natural Resources and Environment (Prescribed Actvities) Amendment Order 1997 under First Schedule, Activity no.1 (i) Agricultural Development preparation of EIA is required for the project submission and approved by Natural Resoruces and Environmental Broad (NREB). Keresa Plantaion has conducted Environmental Imapact Assessment as per report entitled "Proposed Sungai Kubud Oil Palm Estate, Lavang Land District, Sebauh Sub-District, Bintulu Division, Sarawak". Date of EIA approval: 5 December 2016, reference no.: (25) NREB/6-1/2G/48, serial no. 1591.	Complied
		The estate has conducted internal based environmental aspects and impacts based on Keresa Plantations operation. The assessment is conducted according to the Procedure Manual – Identification of Environmental Aspects and Evaluations of Environmental Impacts Ref: KPSB 1/2020 dated 7/1/2020. Aspect & Impact assessment has been reviewed on 7/1/2020.	
		The estate has established environmental management plan base on the results of environmental aspects and impacts and recommendation from assessor report entitled "Proposed Sungai Kubud Oil Palm Estate, Lavang Land District, Sebauh Sub-District, Bintulu Division, Sarawak".	
		The estate submitted the Environmental Monitoring report on quarterly basis to the NREB as required. Sighted the report for 4 <sup>th</sup> quarter 2019,	

### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance			
		$1^{\rm st}$ quarter 2020 and $2^{\rm nd}$ quarter 2020. Latest submission of the EMR was done on 21/9/2020.				
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The continuous monitoring as per initial implementation was implemented on timely basis where for each operating unit the planned programs were included in annual budgeting. Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. The visit confirmed that programs gave continuous improvement accordingly to the company.	Complied			
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Sg Kubud estate environmental improvement program also includes continual improvement plans. For example, waste management, water quality, soil erosion, biodiversity, pesticides and etc.	Complied			
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.	Annual training program of the estate includes environmental awareness and compliance related trainings to the executives, staffs and workers. The training was conducted accordingly on 21/07/2020.	Complied			
	- Major compliance -					
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed Major compliance -	Environmental related matters were discussed during OSH meeting. The last OSH meeting was conducted on 7/7/2020. No issue related to environmental was raised during this meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management.	Complied			
Criterio	Criterion 4.5.2: Efficiency of energy use and use of renewable energy					

Criterio	Criterion / Indicator		Assessment Findings				
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	usag the imp The proo mor the	ge of the non-rend GHG Emission lementation of the estates has estab duce at 3.5 L/ha. hthly basis, which fossil fuel against	ewable energy in – Reduction/Mir management pla lished a baseline The estates moni is reported mont the FFB production	anagement plan to assess the the estate and documented in himization Plan. Sighted the an as follows: for diesel consumption per FFB itor the diesel consumption on thly to head office. The use of on is being monitored.	Complied	
		1. 9	Sighted the monit	oring records FY 2	2020 as follows:		
			Month	Sg. Kubud			
			Jan 2020	5.29			
			Feb 2020	5.61			
			Mar 2020	4.42			
			Apr 2020	3.27			
			May 2020	3.18			
			Jun 2020	3.93			
			Jul 2020	4.25			

### MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	Criterion / Indicator		sessment Findi	ngs		Compliance
				ental of 2 mid r	ractors by renting new tractors. nounted grader 2, 2 tractor and 1	
4.5.2.2	<ul> <li>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.</li> <li>This shall include fuel use by contractors, including all transport and machinery operations.</li> <li>Major compliance -</li> </ul>	Sg Kubud estate has estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.				
4.5.2.3	The use of renewable energy should be applied where possible Minor compliance -	There is no possible option for renewable energy application at Sg Kubud Estate.				Complied
Criterio	n 4.5.3: Waste management and disposal					
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Reg 22/ incl fror ider its i bag	jister RSPO/ISCC) 10/18. Among th uding general was n the operation in tified including do reusable and recycl is and triple rinse	and waste e waste prod te and schedul n estates and mestic waste a clable wastes in d empty chem	prevention plan (KM 4-1 Waste management procedure dated ucts identified and documented ed waste. Sources of waste were I housing area. Common waste and scheduled waste. For estates, dentified included empty fertilizer ical containers. Organic biomass g fronds and chipped fell palms.	

### MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
		Other specific activities such as maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW 305, SW 306, SW 409 and SW 410.	
4.5.3.2	<ul> <li>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</li> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> <li>- Major compliance -</li> </ul>	<ul> <li>Documented pollution prevention plan (KM 4-1) was emphasized in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company mill and estates. Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through landfill.</li> <li>Sighted the sampled implementation of the management plan as follows:</li> <li>1. Domestic were collected 3 time a week and disposed at designated landfill. Sighted the domestic was collection records for the month of June, July and August 2020.</li> <li>2. The estate monitor the recycle waste generated in the estate and recorded in the Waste monitoring form. Sighted the recycle waste generated and documented in the Fifth Scheduled form. Sighted the inventory records for the month of February till August 2020.</li> </ul>	Complied
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	SOP for scheduled waste dated 15/10/2009 was established. For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage. For scheduled waste, the handling was done	Complied

### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterior	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage.	
		A company registered with DOE, E-Concern (M) Sdn Bhd was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company.	
		Sighted the sampled of Scheduled Waste Disposal	
		1. 20/2/2020, SW 305, C/N no. 2020022016KZV7IO	
		2. 26/8/2020, SW 102, C/N no. 2020082716MXRA12	
		3. 26/8/2020, SW 305, C/N no. 2020082716OIR7NB	
		4. 26/8/2020, SW 102, C/N no. 2020082716WLBZ7V	
		5. 26/8/2020, SW 410, C/N no. 20200827165LY38B	
		For clinical waste, collection was conducted by the appointed VMO and has been disposed through licensed contractors. The VMO submitted a copy of consignment note of clinical waste disposal to the estate for references.	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide	- Records of inventory for Empty pesticide containers In Estates, empty chemical containers were being triple rinsed and spot painted in red before return back to supplier. Visit and records confirmed that no empty chemical containers being disposed other than returned back to supplier.	Complied
	containers. - Major compliance -	The estates maintain the inventory and recorded in Triple rinsing log book.	
		Sighted the disposal records as follows:	

### MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
		<ol> <li>Receiving Note: Empty Pesticide Container no. B0048 dated 26/8/2020</li> <li>Receiving Note: Empty Pesticide Container no. B0047 dated 21/8/2020</li> </ol>	
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	Domestic wastes are being disposed at estate landfill and it's away from watercourse and housing area. At Sg Kubud Estate, landfill area is located at field SK1301. Sighted only domestic waste were disposed in the landfill as per SOP established.	Complied
Criterio	<b>n 4.5.4:</b> Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	- GHG Monitoring Plan to Reduce GHG Emission Assessment of all polluting activities for estate is documented under Environmental Management plan. Source of pollution identified from workshop activity, genset/diesel store, fertilizer and chemical application and transportation. The most significant and the most concerned area is under workshop activities and chemical and fertilizer application. Mitigation and action required is documented in the Environmental Management Plan.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Environmental improvement plan is documented under Environmental Management Plan include assessment of all polluting activities within the estate operation such as waste, air emissions and water discharges. For example at genset/diesel store – leakage/spillage of oil/lubricants: containment via proper bunding and flooring, spill kits and oil traps and disposed as scheduled waste. No changes from previous audit.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
Criterio	n 4.5.5: Natural water resources		
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply.	Keresa Plantations Sdn Bhd Water Management Plan (WMP) dated 1/3/2020 was sighted. Including specific parameters for WMP to promote efficient use of water and meet water conservation requirements under Sarawak Water Resource Enactment 1998 and Interim National Water Standards for Malaysia.	Complied
	<ul><li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</li><li>c. Ways to optimize water and nutrient usage to reduce wastage</li></ul>	Water management plan (KP 2-201 dated June 2010) involved water consumption management and quality monitoring which inclusive of drinking water monitoring and discharge water monitoring as per National Water Quality Standard Malaysia (NWQSM)	
	(e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of	Documented as a guideline entitled Riparian Zone Establishment (Ref. no. E 4.5.3; Chapter 4; Issue date Jan 2010; Version 1.0).	
	<ul><li>rainwater, etc.).</li><li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways</li></ul>	Sg Kubud Estate implemented the river water monitoring by taking water samples from 3 sampling points of river and streams running through the estate including Sg. Tebusang, Sg. Selakai and Sg. Kubud.	
	<ul> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> </ul>	Based on site visit at, it was noted that there was no trace of agrochemical application at the allocated riparian zones. The zones were also clearly demarcated using wooden pegs painted with red & white as sighted at Sg. Mapo riparian zone in field SK1401.	
	<ul> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> </ul>	Interview with the sprayers showed that the workers understand the restriction and the consequence of agrochemicals application in the riparian zones.	
	- Major compliance -	River water monitoring also is part of Environmental Monitoring Report (EMR) which required to be submitted to NREB on quarterly basis. Pesticide residue monitoring is carried out on 6 monthly basis.	

### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterio	Criterion / Indicator Assessment Findings		Compliance
		Sample analyses were done every 3 months by I-Testchem Laboratory Services. Sampled analysis report (Report period of Jan – Mar 2020; Ref. # ITC/COA/0226/20) shown that analysis were done against Class IIB of NWQSM and the most of the parameters were in-compliance with the standard.	
		For peat area, Keresa has established Best Management Practices of Oil Palm Cultivation on Peat Land Water Management. The implementation of the management plan has been sighted and verified during site visit at filed SK1404 (Piezometer no.2).	
		The estate monitor the peat subsidence level every 6 months. Sighted the peat subsidence records for April 2020.	
		Piezometer reading were conducted on weekly basis. Sighted the Piezometer reading records as todate September FY 2020	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There were no construction of bunds, weirs and dams across main rivers or waterways passing through Sg Kubud estate which will affecting the downstream users/stakeholders. At peat planted area, field/man made drain installed with weirs and water gates as part of	Complied
		water management plan on peat. This is important to ensure water level is within 50-70 cm from soil surface.	
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).	Water management plan includes rain water harvesting, desilting of road side drains and etc. For housing complex, the rain water harvesting was used for cleaning housing compound and etc.	Complied
	- Minor compliance -		

### MSPO Public Summary Report Revision 1 (Feb 2020)

Criterio	n / Indicator	Assessment Findings	Compliance
4.5.6.1	<ul> <li>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</li> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</li> <li><b>- Major compliance -</b></li> </ul>	Keresa Plantations has engaged a consultant (EnviroLogic Consulting) to conduct a biodiversity assessment of the land at the Estate as well as preparation of site-specific short-term and long-term HCV Management Plans. The report entitled Retrospective High Conservation Value Assessment of Oil Palm Plantation dated January 2014 was sighted. Based on the report, it was noted the presence of HCV 1.2, 1.3, 1.4, 3 and 4.2 within Sg Kubud Estate. HCV 1.2 – Threatened and endangered species in the form of flora and fauna. i.e. 14 tree species under IUCN red list, Sun Bear, Sambar Dear and Asia Black Hornbill. HCV 1.3 – endemic to Borneo. i.e. Bornean Yellow Muntjac and Sixteen species of endemic trees HCV 1.4 – present as wetlands potentially used by migratory birds HCV 3 – presence of peat swaps and kerangas forest. HCV 4.2 – area that legally gazetted for fire protection. Area that act as barriers for fire can become prone to fire i.e. peat swap area.	Complied
4.5.6.2	<ul> <li>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</li> <li>a) Ensuring that any legal requirements relating to the protection of the species are met.</li> <li>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</li> </ul>	HCV management plan is recommended by assessor and included in the report dated January 2014. The plan has included continuous education to targeted staff and workers on illegal hunting and poaching, signage on illegal hunting, patrolling and regular monitoring to ensure no encroachment. Observed no illegal hunting signage are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders.	Complied

### **MSPO Public Summary Report** Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	<ul> <li>The estate has established HCV management plan as per recommendation by assessor and included in the report dated January 2014. Sighted the implementation of the management plan as follows:</li> <li>1. The estate conducted riparian zone monitoring once a month and recorded in Riparian zone checklist. Sighted the monitoring records dated 18/8/2020, 7/8/2020, 28/7/2020, 10/7/2020, 26/6/2020 and 12/6/2020.</li> </ul>	Complied
		2. The estate monitored the wildlife species present in the estate. The estate has established list and code no. for the totally protected wildlife of Sarawak. Sighted the wildlife sighting records in the Sightseeing Book Record. The records include date, animal code, wildlife, place, name of the person and signature.	
Criterio	n 4.5.7: Zero burning practices		
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.		Complied
	- Major compliance -	Addressed in SOP no. 7 – Conservation Measures, under section iii Environment Conservation, version 2 dated 1 Jan 2009, all mitigations measures for plantation activities including land preparation or replanting shall be in compliance with the approved Environment Impact Assessment (EIA) by Natural Resource and Environmental Board of Sarawak.	
		There was no trace of open burning observed during the site visit.	



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -		Complied
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Keresa Plantations has established SOP for the estates as a guidance on the daily estate operation. Refer Keresa Plantations Sdn. Bhd. – Standard Operations & Procedures, Ver. 2, Effective date 1/1/2009. The SOP covers on:	Complied
		1. Muster Call	
		2. Nursery	

Criterior	n / Indicator	Assessment Findings	Compliance
		3. Establishment	
		4. General Maintenance	
		5. Harvesting and Pruning	
		6. Operational Procedures	
		7. Conservation Measures	
		Keresa Plantations has established system to monitor and control of best practice implementation at its estate. Sighted the sampled reports as follows:	
		1. Sustainability and Compliance Department visit	
		a. Sighted the visit report dated 24/5/2020 for visit conducted on 20 and 22/5/2020, covers on Crop Production. Harvesting, Weeding, Manuring and Roads.	
		<ul> <li>b. Sighted the visit report dated 23/1/2020 for visit conducted on 22/1/2020 and 27/1/2020, covers on field condition, Harvesting, Roads, path bridges, pruning, weeding</li> </ul>	
		2. Agronomist visit.	
		a. Latest agronomist visit was conducted on 7/10/2019. The reports covers on Rainfall, Palm Growth, Yield, Nutritional Status, Fertiliser Recommendations, and Crop Losses.	
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of	Sg Kubud Estate has overlain a topographic map on the soil map to identify areas of potential erosion risk at Sg Kubud Estate. Area predominantly flat area and no steep area within the estate. Inspection of field conditions at estate showed well established and maintained groundcover vegetation.	Complied

### PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

Criterior	n / Indicator	Assessment Findings	Compliance
	either soil, nutrients or chemicals.		
	- Major compliance -		
4.6.1.3	A visual identification or reference system shall be established for each field.	Visual identification has been established for each field and divided into division and blocks. Each block is named by road and visual	Complied
	- Major compliance -	identification (field marker) erected for reference.	
Criterior	4.6.2: Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	Keresa Plantations has established 5 years business plan as a guidance for daily estate operations. Sighted the 5 year business plan FY 2021 – 2025.	Complied
	- Major compliance -		
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3- 5 years.	No replanting activity is planned within 5 years since this estate has planting the oil palm in year 2012 first planting.	Complied
	- Major compliance -		
4.6.2.3	The business or management plan may contain:	The business plan established consist of elements such as:	Complied
	a) Attention to quality of planting materials and FFB	1. Mature hectare	
	b) Crop projection: site yield potential, age profile, FFB yield	2. Estimated FFB price	
	trends	3. Yield per hectare	
	c) Cost of production : cost per tonne of FFB	4. Estimated FFB production	
	d) Price forecast	5. Upkeep and Maintenance (Total Cost, Cost/ha and Cost/ton)	

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Criterio	n / Indicator	Assessment Findings	Compliance
	e) e) Financial indicators : cost benefit, discounted cash flow, return on investment	6. Harvesting (Total Cost, Cost/ha and Cost/ton)	
	- Major compliance -	<ol> <li>General Charges (Total Cost, Cost/ha and Cost/ton)</li> <li>Total Cost (Total Cost, Cost/ha and Cost/ton)</li> </ol>	
		9. Income	
		10. Profit and Loss	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.	Management has the working sheet/ costing book for all the field operation for realization. Sampled the sanitation schedule for 2020 in monthly basis by manager for implementation of profit and loss	Complied
	- Major compliance -	monitoring.	
Criterio	n 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	In Sg Kubud Estate, the payment mode is cash and as per contract. The documents are available and paid accordingly.	Complied
	- Major compliance -		
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sighted the agreement for contractor Yun Hoo Sdn Bhd for FFB, fertilizers and worker's transportation in Keresa Plantation Sdn Bhd signed on 27 <sup>th</sup> December 2019 for the contract period 01.01.2020 till 31.12.2020.	Complied
Criterio	n 4.6.4: Contractor		
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	KERESA Plantation Sdn. Bhd. has educated the contractors on MSPO. Latest MSPO awareness briefing to contractors was conducted on	Complied
	1		

Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	<ul><li>05.06.2020. Interview with the contractors found that they understood the MSPO requirements.</li><li>All the contractors are aware that estate is certified under MSPO. Therefore, the contractors have been instructed by the estate management to follow the MSPO standard requirement.</li></ul>	
		The policies were already communicated through the tender process and once the contract sign by both parties. The contractors shall be subjected to the management system audits by auditors assigned by the management as and when necessary as deemed stated in the contract agreement.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	Sighted the agreement for contractor Yun Hoo Sdn Bhd for FFB, fertilizers and worker's transportation in Keresa Plantation Sdn Bhd signed on 27 <sup>th</sup> December 2019 for the contract period 01.01.2020 till 31.12.2020.	Complied
		Sampled the payment voucher for Yun Hoo Sdn Bhd amounting to RM 169, 215.50 for FFB Transport and FFB Harvesting on 08.09.2020.	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	Sample contract and payment record verification together with interviews of estates management found that the payments have been made as per contract. The management monitored by checking and	Complied
	- Minor compliance -	signing the assessment of the contractor for each task before the payment was made.	
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.	The contractor works has been recorded and approved in work verification and work order records before approved for payment.	Complied



Criterior	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.7 Princ	ciple 7: Development of new planting		
Criterior	<b>1 4.7.1:</b> High biodiversity value		
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.	No development of new planting in the estate.	N/A
	- Major compliance -		
Criterior	<b>1 4.7.2:</b> Peat Land	·	
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.	No development of new planting in the estate.	N/A
	- Major compliance -		



Criterion / Indicator		Assessment Findings	Compliance
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.	No development of new planting in the estate.	N/A
	- Minor compliance -		
Criterio	n 4.7.4: Soil and topographic information		
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	No development of new planting in the estate.	N/A



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.	No development of new planting in the estate.	N/A
	- Major compliance -		
Criterio	<b>n 4.7.5</b> : Planting on steep terrain, marginal and fragile soils	·	
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.	No development of new planting in the estate.	N/A
	- Major compliance -		
Criterio	n 4.7.6: Customary land		
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent,	No development of new planting in the estate.	N/A



Criterio	n / Indicator	Assessment Findings	Compliance
	dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
	- Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	No development of new planting in the estate.	N/A
	- Minor compliance -		
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented.	No development of new planting in the estate.	N/A
	- Major compliance -		



Criterion / Indicator		Assessment Findings	Compliance
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	No development of new planting in the estate.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.		N/A
	- Minor compliance -		



#### **Appendix B: List of Stakeholders Contacted**

Government Officer:	Community/neighbouring village:		
N/A	Rh. Majang		
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:		
Wagro Trading S/B	Gender Committee Representatives		
K.C. Chan	Foreign & local workers		
Paul Tao Chung Chao	NUPW Representatives		
Wong Yuk Zung			
PNS Jaya Sdn Bhd			

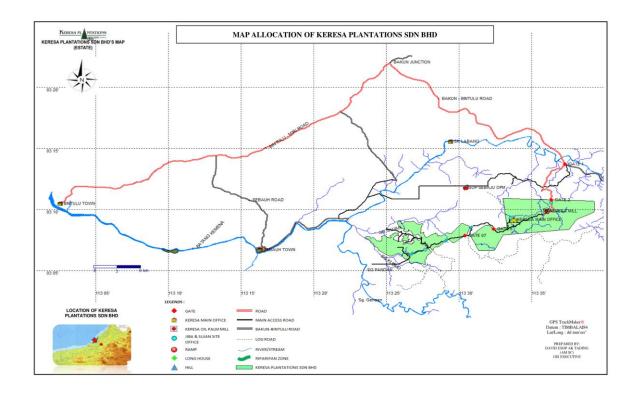


#### **Appendix C: Smallholder Member Details**

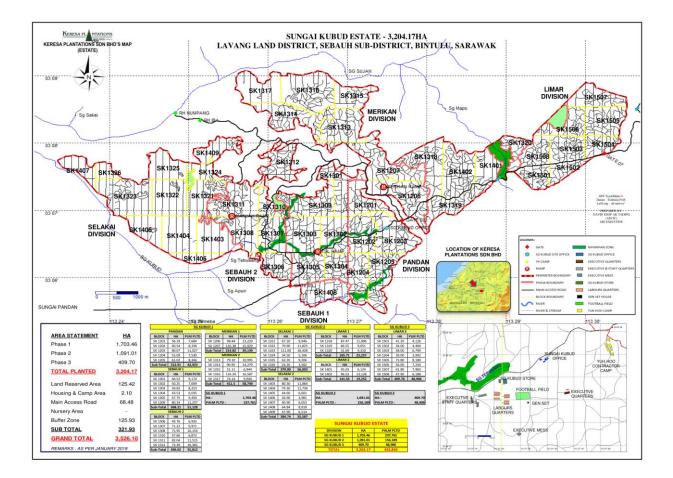
No.	Smallholder		Location of	GPS	Certified	Planted
	Name	MPOB License Number	Planted Area (District)	Coordinates	Area (ha)	Area (ha)
	N/A					
		<u>_</u>				



#### Appendix D: Location and Field Map







### PF824 MSPO Public Summary Report Revision 1 (Feb 2020)

#### **Appendix E: List of Abbreviations**

BOD CB CHRA COD CPO EFB EHS EIA EMS FFB FPIC GAP GHG GMP GHG GMP GPS HCV IPM ISCC LD50 MSPO	Biochemical Oxygen Demand Certification Bodies Chemical Health Risk Assessment Chemical Oxygen Demand Crude Palm Oil Empty Fruit Bunch Environmental, Health and Safety Environmental Impact Assessment Environmental Management System Fresh Fruit Bunch Free, Prior, Informed and Consent Good Agricultural Practice Greenhouse Gas Good Manufacturing Practice Global Positioning System High Conservation Value Integrated Pest Management International Sustainable Carbon Certification Lethal Dose for 50 sample Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT OER	Metric Tonnes Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO POM	Palm Kernel Oil Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA SIA	Social & Environmental Impact Assessment Social Impact Assessment
SOP	Standard Operating Procedure