

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA1\_3)  
Public Summary Report**

<b>Sime Darby Plantation Berhad</b>
Client company Address: Level 3A, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 2)</b> <b>Chersonese Palm Oil Mill</b>  Location of Certification Unit: 34350 Kuala Kurau Bagan Serai, Perak, Malaysia

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

1. Company Details			
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	06/09/2004
<b>Parent Company Name</b>	Sime Darby Plantation Berhad		
<b>Address</b>	Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Strategic Operating Unit (SOU 2)		
<b>Address</b>	Chersonese Palm Oil Mill 34350 Kuala Kurau, Bagan Serai, Perak, Malaysia		
<b>Contact Name</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Azizi Abdul Rahman		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a> <a href="mailto:kks.chersonese@simedarby.com">kks.chersonese@simedarby.com</a>
<b>Telephone</b>	+603-78484379 (Head Office) +6019 2274216	<b>Facsimile</b>	+603 78484363 (Head Office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 590800	<b>Date of First Certification</b>	05/10/2011
		<b>Certificate Start Date</b>	05/10/2016
		<b>Certificate Expiry Date</b>	04/10/2021
<b>Scope of Certification</b>	Palm oil and Palm Kernel Production		
<b>Applicable Standards</b>	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D – Identity Preserved)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 682039	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	09/01/2023
MSPO 688334	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Chersonese Palm Oil Mill	Kilang Kelapa Sawit Chersonese 34350 Kuala Kurau, Perak, Malaysia	4° 58' 38" N	100° 27' 40" E
Chersonese Estate	Ladang Chersonese 34100 Selama, Perak, Malaysia	4°59' 04" N	100° 26' 59" E
Holyrood Estate	Ladang Holyrood 34100 Selama, Perak, Malaysia	5°07' 26" N	100° 42' 36" E
Tali Ayer Estate	Ladang Tali Ayer 34300 Bagan Serai, Perak, Malaysia	5°03' 30" N	100° 31' 20" E
Kalumpong Estate	Ladang Kalumpong/Byram 34300 Bagan Serai, Perak, Malaysia	4° 58' 11" N	100° 36' 05" E

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Chersonese Estate	3,026.77	25.87	241.08	3,293.72	91.89
Holyrood Estate	1,234.75	12.19	85.80	1,332.74	92.65
Kalumpong Estate	2,400.86	21.09	86.32	2,508.27	99.17
Tali Ayer Estate	3,023.96	24.24	707.90	3,756.10	80.51
<b>Total</b>	<b>9,686.34</b>	<b>83.39</b>	<b>1,121.10</b>	<b>10,890.83</b>	

Remarks:

Tali Ayer Estate:

- Decrease in total hectare of 226.78 ha due to land acquisition by governments. (Increase in total of 172.9 ha for infrastructure & others (ha) due hectarage of Byram Div is included due to land acquisition by non-government third party.)

Holyrood Estate:

- Decrease in total of 0.42 ha due to latest GPS survey on April 2019.

Chersonese Estate:

- Increase in total of 4.72 ha for infrastructure & other area due to last GPS survey on April 2019.

Kalumpong Estate:

- Decrease in total of 91.83 ha due to last GPS survey on April 2019.

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6. Plantings & Cycle							
Estate	Age (Years)					Mature** (ha)	Immature (ha)
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Chersonese Estate	731.52	1,366.72	677.42	251.11	-	2,295.25	731.52
Holyrood Estate	213.37	806.56	157.76	57.06	-	1,021.38	213.37
Kalumpong Estate	387.47	375.57	1,378.92	258.90	-	2,013.39	387.47
Tali Ayer Estate	184.43	1,249.19	1,543.99	46.35	-	2,839.53	184.43
<b>Total (ha)</b>	1,516.79	3,798.04	3,758.09	613.42	-	8,169.55	1,516.79

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (mt) (Oct 2018-Sept 2019)	Actual (mt) (June 2018-June 2019)	Forecast (mt) (Oct 2019-Sept 2020)
Chersonese Estate	50,453.33	55,666.57	56,600.00
Holyrood Estate	19,237.35	17,715.66	22,630.57
Tali Ayer Estate	70,830.28	51,178.77	54,462.30
Kalumpong Estate	50,866.50	65,509.10	50,055.00
<b>Total</b>	191,387.46	190,070.10	183,747.87

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Oct 2018-Sept 2019)	Actual (mt) (June 2018-June 2019)	Forecast (Oct 2019-Sept 2020)
Somme Estate	N/A	39.50	N/A
Elphil Estate		354.80	
Kamuning Estate		459.16	
<b>Total</b>		853.46	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Oct 2018-Sept 2019)	Actual (June 2018-June 2019)	Forecast (Oct 2019-Sept 2020)
N/A			

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<b>Total</b>			
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<b>10. Certified Tonnage</b>			
	Estimated (mt) (Oct 2018-Sept 2019)	Actual (mt) (June 2018-June 2019)	Forecast (mt) (Oct 2019-Sept 2020)
<b>Mill Capacity: 45 MT/hr</b>  <b>SCC Model: IP</b>	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	191,387.46	190,070.10	183,747.87
	<b>CPO (OER: 21.00%)</b>	<b>CPO (OER: 20.76%)</b>	<b>CPO (OER: 21.50 %)</b>
	40,191.37	39,461.39	39,505.79
	<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.31 %)</b>	<b>PK (KER: 5.50 %)</b>
	10,526.31	10,093.95	10,106.13
<b>Remarks:</b> Period of June 2018 - September 2018 FFB: 58,930.76 MT; CPO: 12,225.51 MT; PK: 3,314.82 MT Period of October 2018 – June 2019 FFB: 131,139.34 MT; CPO: 27,235.88 MT; PK: 6,779.13 MT			

<b>11. Actual Sold Volume (CPO) (June 2018 – June 2019)</b>					
	RSPO Certified (mt)	Other Schemes Certified		Conventional (mt)	Total (mt)
		ISCC	RSB		
<b>CPO (MT)</b>	7,745.04	-	-	31,716.35	39,461.39

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

<b>12. Actual Sold Volume (PK) (June 2018 – June 2019)</b>					
	RSPO Certified (mt)	Other Schemes Certified		Conventional (mt)	Total (mt)
		ISCC	RSB		
<b>PK (MT)</b>	3,650	-	-	6,443.95	10,093.95

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

<b>13. Actual Group certification Claims (June 2018 – June 2019)</b>		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	-	-
<b>IS-CSPKO</b>	-	-
<b>IS-CSPKE</b>	-	-

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01, Level 29, the Gardens North Tower  
Mid Valley City  
Lingkaran Syed Putra 59200 Kuala Lumpur  
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 15-19/7/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 4/10/2019. The audit programmes are included in Section 2.3.

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. RSPO Principles & Criterias 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO 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



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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 Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Chersonese Palm Oil Mill	√	√	√	√	√
Chersonese Estate	-	√	-	√	√
Holyrood Estate	√	-	√	√	√
Tali Ayer Estate	-	√	-	√	√
Kalumpong Estate	√	-	√	√	√

**Tentative Date of Next Visit:** July 20, 2020 – July 24, 2020

**Total No. of Mandays:** 16.0 mandays including one day SC audit for mill

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO

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		and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.
Mohd Hafiz Mat Hussain	Team Member	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, social issues and workers/stakeholders consultation.
Valence Shem	Team Member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C, Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Hafriazhar Mokhtar	Team member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the RSPO supply chain element for mill. He is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons:**

No.	Name	Role
	Nil	

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**2.3 Assessment Plan**

The assessment plan was sent to client prior to the assessment.

PRELIMINARY AGENDA							
Date	Time	Subjects	HNS	MH	VS	HA	MHZ
Sunday 14/07/2019	PM	Audit team travelling to site	√	√	√	-	√
Monday 15/07/2019 Chersonese Estate	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> <li>Verification on previous audit findings</li> </ul>	√	√	√	-	√
	0900 - 1200	Chersonese Estate 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 area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-	√
	1000 - 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-	-	-
	1200 – 1300	Lunch	√	√	√	-	√
	1300 - 1630	Chersonese Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-	√
	1630 – 1700	Interim Closing Briefing	√	√	√	-	√

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Tuesday 16/07/2019  Holyrood Estate	0830 - 1200	Holyrood Estate 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 area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-	√
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-	-	-
	1200 -1300	Lunch	√	√	√	-	√
	1300 - 1630	Holyrood Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-	√
	1630 - 1700	Interim Closing Briefing	√	√	√	-	√
Wednesday 17/07/2019  Kalumpang Estate	0830 - 1200	Kalumpang Estate 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 area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-	√
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-	-	-
	1200 -1300	Lunch	√	√	√	-	√

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	1300 - 1630	Kalumpang Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-	√
	1630 - 1700	Interim Closing Briefing	√	√	√	-	√
Thursday 18/07/2019  Tali Ayer Estate	0830 - 1200	Tali Ayer Estate 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 area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-	√
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-	-	-
	1200 -1300	Lunch	√	√	√	-	√
	1300 - 1630	Tali Ayer Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-	√
	1630 - 1700	Interim Closing Briefing	√	√	√	-	√

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Friday 19/07/2019  Chersonese Palm Oil Mill	0830 - 1200	Chersonese Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√	-	√
	1200 -1300	Lunch	√	√	√	-	√
	1300 - 1600	Chersonese Palm Oil Mill Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√	-	√
	1600 - 1630	Verify any outstanding issues & Preparation for closing Meeting	√	√	√	-	√
	1630 - 1730	Closing Meeting	√	√	√	-	√
Friday 19/07/2019  Chersonese Palm Oil Mill	0900 – 1630	Supply chain audit for Chersonese POM <ul style="list-style-type: none"> <li>• General COC for supply chain</li> <li>• RSPO rules communication and claim</li> <li>• Module D: Identity Preserved</li> </ul>	-	-	-	√	√
	1630 - 1730	Closing Meeting	-	-	-	√	√

**Major Non-conformance Close-Out Assessment Plan**

PRELIMINARY AGENDA		
Time	Subjects	Mohd Hidhir
3/10/19 PM	Audit Team travelling to Kamunting. Check-in at SSL Traders Hotel, Kamunting	√
4/10/19  0730 AM  08.30 – 09.00	Travelling to Chersonese Estate  Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Briefing on site verification plan</li> </ul>	√
09.00 – 13.00	Chersonese POM – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
13.00 – 14.00	Lunch break and travel back to KL	√

**Section 3: Assessment Findings**

**3.1 Normative requirement applied for this assessment:**

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

**3.2 Time Bound Plan progress for multiple management units**

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia - Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.	Yes

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	<p>Indonesia - Effectively 25 SOUs.          For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p>	
<p>Have all the estates and mills certified within five years after obtaining RSPO membership?</p>	<p>For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p>	<p>Yes</p>
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL’s management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>*RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p> <p>SDPL (Liberia Operation) has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security &amp; safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p>	<p>Yes</p>



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<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.          Is this consistent with the ACOP reporting?</p>	<p>Sime Darby Plantation’s time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian &amp; Indonesian) and all Malaysian SOUs have been RSPO certified including 2 new mills have been in Jan and Feb 2014.          For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues.          SDP’s is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016.          SDP’s time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified.          Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.          For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, <a href="http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007">http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007</a></p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment.          SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:  <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion</li> </ul> </p>	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>

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<p>7.3.</p> <p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1<sup>st</sup> quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</a></p>	<p>Yes</p>																																																																			
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission stauts as per below table:</p> <p style="text-align: center;"><b>SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</b></p> <table border="1" data-bbox="726 1048 1321 1554"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="19">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Pecconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggul Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Pecconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggul Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	<p>Yes</p>
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be</p>	<p>Yes</p>	<p>Yes</p>																																																																			

available.		
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**3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	

**3.4 Details of findings**

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 3<sup>rd</sup> annual surveillance assessment there were three (3) Major nonconformities & five (5) Minor nonconformities raised. The Chersonese Palm Oil Mill 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 Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1811307-201904-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.1 Major
<b>Date Issued</b>	18/07/2019	<b>Due Date</b>	16/10/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2019
<b>Statement of Nonconformity:</b>	Procedure to show the monitoring demonstrated by the company to ensure the recruiting agents are comply with the requirements was not clearly identified.		
<b>Requirement Reference:</b>	Standard Operating Procedures (SOPs) for estates and mills are documented.		
<b>Objective Evidence:</b>	Interviewed with the workers from Indian found that they had to pay to agent in their home country before came to Malaysia. The amount they paid were about 30,000 – 120,000 rupees. Document reviewed on the Declaration by Manpower		

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	Agents dated 13/10/2017 found that the cost of workers paid to agents and sub-agents is 36,073 rupees. Sime Darby Plantation Berhad has developed Workforce Management Unit Liaison & Recruitment (LR) Procedure with Doc. No. WMU/LR-SOPP/MARCH2016, rev. 0 dated 30/3/2016. However, there is no clear procedure to show the monitoring demonstrated by the company to ensure the agents and/or the contractors are fulfilling the agreement.
<b>Corrections:</b>	Meeting between SQM Malaysia Unit, GSQM and People & Engagement Unit, GSQM was done on 23 July 2019 to highlight this matter and to discuss on the development of Responsible Recruitment Procedure, which includes the monitoring mechanism in Item 4.2 (work in progress, see attached email communication, timeline and draft procedure).
<b>Root Cause Analysis:</b>	There is no procedures to monitor the recruitment agents' compliance to the agreement.
<b>Corrective Actions:</b>	People & Engagement Unit, GSQM to produce Final Responsible Recruitment Procedure as per timeline which includes monitoring of recruitment cost under Section 4.3.4.
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Verification:            Meeting between SQM Malaysia Unit, GSQM and People &amp; Engagement Unit, GSQM was done on 23 July 2019. Human Right Task Force initiated to discuss on the development of Responsible Recruitment Procedure. Specific mechanism to monitor recruitment agent (4.2 Working with Recruitment Agents) has been developed which include right to conduct audits to ensure compliance of recruitment agents and their sub-agents. Sime Darby Plantation do not commission individuals or third party agents s to recruit, hire or employ workers and does not authorize any parties to collect any form of fee from potential candidates on its behalf (4.3 No charging on recruitment fees). The new details of cost to be paid has been revised with the maximum of INR 60,000 only.</p> <p>The corrective action taken is found to be effective. Major NC is closed on 4/10/2019. Continuous implementation will be further verified in the next assessment.</p>

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1811307-201904-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.1.3 Major
<b>Date Issued</b>	18/07/2019	<b>Due Date</b>	16/10/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2019
<b>Statement of Nonconformity:</b>	Implementation of the plan for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts was not effective.		
<b>Requirement Reference:</b>	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Objective Evidence:</b>	Chersonese Estate, Holyrood Estate, Kalumpang Estate and Tali Ayer Estate has developed Social Impact Assessment Plan FY 2019 which included issue, action has taken, person in charge and remark. However, the plan was not comprehensive as the plan was updated on the action taken but not the details of		

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	how to mitigate the negative impacts, promotes the positive ones and the monitoring of impacts. Chersonese POM has developed Social Management & Action Plan for Year 2019. However, the plan only included issues and person-in-charge with time frame. No plan action of mitigation of negative impacts, promotion of the positive ones and the monitoring of the impacts in the plan.
<b>Corrections:</b>	To include the required column indicating the methodology after review
<b>Root Cause Analysis:</b>	Existing format does not indicate the method of approach as required for SIA action plan
<b>Corrective Actions:</b>	To ensure the review is done on a periodical basis by SQM as a standard format.
<b>Assessment Conclusion:</b>	The latest Social Management Action Plan for 2019 dated 5/8/19 was sighted. 8 issues have been identified (positive and negative) with identified mitigation plan approach and undertaking. Each action plan assigned to specific person in charge with targeted time frame for improvement. The corrective action plan is found to be effective. Major is closed on 4/10/19. Continuous implementation will be further verified in the next assessment.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1811307-201904-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.1 Major
<b>Date Issued</b>	18/07/2019	<b>Due Date</b>	16/10/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2019
<b>Statement of Nonconformity:</b>	Wages of the workers on 7/12/2018 were not paid accordingly.		
<b>Requirement Reference:</b>	Documentation of pay and conditions shall be available.		
<b>Objective Evidence:</b>	Sampled of the payslips for December 2018 for workers (Gang 31 – 14 workers) in Chersonese POM found that they were not paid for 7/12/2018 as the attendance was not captured in the Work Allocation Report in the system. This has been verified by the Checkroll Team Specialist in head office.		
<b>Corrections:</b>	Mill management has reimbursed the shortage of all 14 personnel affected.		
<b>Root Cause Analysis:</b>	The root cause was the error omitted by HQ finance by not capturing due to saving it as 24 days which was incorrect; whereas mill had saved as 25 days enabling it to be saved		
<b>Corrective Actions:</b>	Kindly note that upon saving in the system by mill it would be followed by forwarding to HQ Finance to be captured on their part. Mill has no jurisdiction to rectify on the part of HQ Finance. It is solely the responsibility of HQ Finance (Checkroll Specialist) to do so. If such an oversight occurs mill shall immediately notify HQ Finance to rectify with immediate effect either via email or by phone as a means of alleviating the slipup.		
<b>Assessment Conclusion:</b>	Major NC close out verification: i) Evidence of reimbursement was sighted for (gang 31 -14 workers) for 1 day in July 2019 payroll. Refer to document entitled, allowance and deduction details by employee before MEP of July 2019, SAP code reference CKRRM034. Interview with the affected workers (gang 31) has confirmed that they have received the payment in July 2019 salary in the amount of RM 38.46 (December 2018 short pay)		

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	<p>ii) Daily input for August and September 2019 were checked and verified with attendance report prior to submission to finance department. No recurrence of short pay recorded. The corrective action plan is found to be effective.</p> <p>Major NC is closed on 4/10/19. Continuous implementation will be further verified in the next assessment.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1811307-201904-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.3 Minor
<b>Date Issued</b>	18/07/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	The PPE implementation was not implemented effectively.		
<b>Requirement Reference:</b>	Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations.		
<b>Objective Evidence:</b>	KKS Chersonese: 1. PPE implementation at Composting Plant was not implemented as per PPE identified in the HIRARC (eg: mask and glove)		
<b>Corrections:</b>	To conduct training relating to PPE awareness & avail safety signages. Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.		
<b>Root Cause Analysis:</b>	The compost plant was handed over to mill's management on 15/6/19; hence mill had insufficient time to monitor it's employees.		
<b>Corrective Actions:</b>	To conduct training relating to PPE awareness & avail safety signages. Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.		
<b>Assessment Conclusion:</b>	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1811307-201904-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Minor
<b>Date Issued</b>	18/07/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Mechanism to ensure the compliance was not implemented effectively.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		

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<p><b>Objective Evidence:</b></p>	<p>As per the approval from JTK for the maximum overtime of 130 hours per month with Ref. No.: BHG.PU/9/134 JLD 9(11) dated 27/3/2017, the workers are not allowed to work more than 4 hours of overtime if work on rest day, public holiday and replacement of public holiday. However, document reviewed on the Daily Input Form in Chersonese POM found that the following workers worked more than 4 hours during work on rest day.</p> <table border="1" data-bbox="502 584 1209 786"> <thead> <tr> <th>Employee No.</th> <th>Date</th> <th>Hours of Overtime</th> </tr> </thead> <tbody> <tr> <td>132397</td> <td>30/12/2018</td> <td>12</td> </tr> <tr> <td>88313</td> <td>30/12/2018</td> <td>12</td> </tr> <tr> <td>122299</td> <td>30/12/2018</td> <td>12</td> </tr> <tr> <td>79268</td> <td>6/1/2018</td> <td>8</td> </tr> </tbody> </table> <p>ii) Chersonese Estate, Holyrood Estate, Kalumpang Estate and Chersonese POM are in the midst of application of permit for deduction of salary for water usage (CE: submitted on 12/7/2019; HE: received email from MOHR on 8/7/2019 for more documents; KE: submitted on 13/3/2019). However, they continue to deduct the salary of workers for the sampled months of October 2018, December 2018, January 2019, March 2019 and June 2019.</p>	Employee No.	Date	Hours of Overtime	132397	30/12/2018	12	88313	30/12/2018	12	122299	30/12/2018	12	79268	6/1/2018	8
Employee No.	Date	Hours of Overtime														
132397	30/12/2018	12														
88313	30/12/2018	12														
122299	30/12/2018	12														
79268	6/1/2018	8														
<p><b>Corrections:</b></p>	<p>i) Available log book to ensure OT performed does not exceed the 4 hour limit. The check roll clerk will monitor the OT on daily basis and monthly for the overall.  ii. Estate &amp; mill has ceased deducting until approval given by JTK.</p>															
<p><b>Root Cause Analysis:</b></p>	<p>i. Mill currently faces shortage of manpower from 60 to 54 (a shortage of 6 workers)  ii. This was a practice since the previous management</p>															
<p><b>Corrective Actions:</b></p>	<p>i. To recruit workers to full requirement.  ii. Estate &amp; mill currently is awaiting approval after submission to JTK Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.</p>															
<p><b>Assessment Conclusion:</b></p>	<p>Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.</p>															

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<p><b>NCR Ref #</b></p>	<p>1811307-201904-N3</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p>Indicator 6.5.3 Minor</p>
<p><b>Date Issued</b></p>	<p>18/07/2019</p>	<p><b>Due Date</b></p>	<p>Next annual surveillance assessment</p>
<p><b>Closed (Yes / No)</b></p>	<p>No</p>	<p><b>Date of nonconformity Closure</b></p>	<p>"Open"</p>
<p><b>Statement of Nonconformity:</b></p>	<p>Conditions of the linesite and the linesite inspection were found unsatisfactory.</p>		
<p><b>Requirement Reference:</b></p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p>		
<p><b>Objective Evidence:</b></p>	<p>Site visit to linesite of Chersonese Estate found issues as below:  a. Petrol filled in the 4 litre container without labelling</p>		



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	<p>b. Plastic bottles were found inside the dustbin at house no. 11/90. Site visit to linesite of Sg. Krian Division in Tali Ayer Estate found the following issues:</p> <p>a. Water stagnant at the drainage system with bad odour. b. Boots and plastic bottles found inside the dustbin. c. Inter-spraying pump and fertilizer pales were kept inside the house no. 31A. d. Ceiling with a big hole and 3 window glasses were missing at house no. 31A. e. Sign of spraying noted at the linesite compound.</p> <p>Linesite inspection that carried out by Hospital Assistant was found not effective as in the checklist dated 12/7/2019 shown everything were comply. However, when site visit to the linesite in Sg. Krian Division found the following inspected items were not as per the real situation.</p> <p>a. Recycle bin available in the housing complex. b. Free from stray dogs. c. No stagnant water in drainage system.</p>
<b>Corrections:</b>	Estate management will take action to clear the clogged drainages and to conduct comprehensive housekeeping at the said area. i. Others than, estate management will conduct the awareness training & responsibility towards environmental hygiene for among the workers. ii. The housing inspections are to be carried out as per established checklist and covered for the all area.
<b>Root Cause Analysis:</b>	<p>i. Workers were ignorant towards maintaining the cleanliness and sanitary environment of housing area</p> <p>ii. Workers housing inspections were carried out on random basis (selective areas)</p>
<b>Corrective Actions:</b>	<p>To ensure information is relayed to residents during weekly inspections such as gotong royong etc.</p> <p>i) To be verified on site by management representative.</p> <p>ii) To appoint a representative from each row of housing complex to do regular monitoring on housing complex with a basic criteria inspection on proper rubbish dumping, drainage and grass cutting to improvise housing complex management. Improvise schedule of rubbish waste collection. Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.</p>
<b>Assessment Conclusion:</b>	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1811307-201904-N4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.6.10 Minor
<b>Date Issued</b>	18/07/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	The management and disposal of wastes were not effectively demonstrated.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).		



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<p><b>Objective Evidence:</b></p>	<p>1) Chersonese Estate have set up domestic wastes collection centre at Block 01C. The rubbish from the residential areas is first dumped on the ground and thereafter filled into a bin by backhoe. It was observed that the dumping ground is just situated next to a field drain which end is connected to Kurau River. The Environment Aspect &amp; Impact assessment showed that this activity has yet to be assessed and therefore aspects like leachate flowing to the field drain and solid wastes fell into the drain were not captured, although these aspects could be observed on site.</p> <p>2) Kalumpong Estate dispose their solid wastes at the landfill governed by the Majlis Daerah Kerian (Kerian District Council). The delivery of the waste can be evident through receipt issued by the council. However, the latest bill available was #06060016 dated 6/6/2018 and no other bill ever since. Thus, whether or not the rubbish from the collection bin have reached the council's landfill is not clear.</p> <p>3) Based on verification of landfill and domestic wastes bin at the collection centres of all estates, it was observed that recyclable wastes such as plastic and metal were also dumped there. The recycle bins with colour code at various areas were also not effectively utilised. It was observed that mixture of wastes were found in the recycle bins.</p>
<p><b>Corrections:</b></p>	<p>i. To identify new location of temporary dumping site and to ensure no leachate into collection drain.</p> <p>ii. The current person in charge which took over from the previous PIC shall make avail these receipts. iii. To re-initiate and educate all employees on waste segregation at source.</p>
<p><b>Root Cause Analysis:</b></p>	<p>i. Location of temporary dumping site is near with collection drain.</p> <p>ii. The required receipts were not appropriately documented / filed.</p> <p>iii. It has been sometime since the recycling programmes were carried out.</p>
<p><b>Corrective Actions:</b></p>	<p>1) To conduct regular inspection on temporary dumping site and to ensure comply with SDP SOP.</p> <p>2) Management reps shall ensure the receipts are verified &amp; filed. The receipts shall to attach together with the others documents for the management release the payment to the contractor.</p> <p>3) To conduct a refresher campaign relating to the Recycle program.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
<p><b>NCR Ref #</b></p>	<p>1811307-201904-N5</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p>Indicator 5.6.3 Minor</p>
<p><b>Date Issued</b></p>	<p>18/07/2019</p>	<p><b>Due Date</b></p>	<p>Next annual surveillance assessment</p>
<p><b>Closed (Yes / No)</b></p>	<p>No</p>	<p><b>Date of nonconformity Closure</b></p>	<p>"Open"</p>

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<b>Statement of Nonconformity:</b>	The data in the RSPO GHG Calculator was not consistent with the one provided by the mill.
<b>Requirement Reference:</b>	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.
<b>Objective Evidence:</b>	Chersonese POM: Based on verification of monthly records and production report for year 2018, the followings inconsistencies were observed: 1) Diesel: 23,415 lt/year (vs. 24,983 lt/year in GHG Calculator) 2) Compost applied: 14,951.59 mt/year (vs. 21,747.31 mt/year in GHG Calculator) 3) CPO produced: 33,856.149 mt/year (vs. 33,885.85 mt/year in GHG Calculator) 4) PK produced: 8,909.456 mt/year (vs. 8,912.54 mt/year in GHG Calculator) 5) POME: 21,327.80 m3/year (vs. 111,503.60 mt/year in GHG Calculator) 6) Grid electricity utilisation: 713,746 kWhr/year (vs. 1,226,183.82 kWhr/year in GHG Calculator)
<b>Corrections:</b>	OU's shall liaise with SQM regarding this matter (for rectification of figures) prior to its full implementation on a monthly basis.
<b>Root Cause Analysis:</b>	The GHG calculator was implemented by HQ & was not delegated to OU's for verification.
<b>Corrective Actions:</b>	SQM shall conduct briefing relating to the managing of GHG calculator Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.
<b>Assessment Conclusion:</b>	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.

<b>Opportunity for Improvements</b>	
OFI #	Description
<b>OFI 1</b>	<p><b>1811307-201904-I1</b></p> <p><b>Indicator 5.1.3</b></p> <p><b>Details:</b> The management of PKO storage (located under FFB ramp) can be further improved by ensuring the effectiveness of the concrete perimeter bund in preventing the kernel oil from spilling to the environment.</p>

<b>Positive Findings</b>	
PF #	Description
<b>PF 1</b>	Good commitment from the managemet.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1643002-201805-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.3.3 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/08/2018

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<b>Statement of Nonconformity:</b>	The waste management and disposal plan to avoid or reduce pollution was not adequately documented and implemented.
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.
<b>Objective Evidence:</b>	Kalumpong Estate: - A light bulb was found dumped in the recycle bin under category of glass waste type - The scheduled waste code SW 109 was not identified in Second Schedule (Notification of Scheduled Waste Generation) hence missing from the Fifth Schedule (Scheduled Waste Inventory)
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Conduct of training to increase awareness to workers on Scheduled Waste Regulation during muster morning by competent CePSWaM trainer.</li> <li>2. Conduct of periodic inspection and enhance enforcement. i.e. daily patrol by AP, weekly workers housing complex inspection by HA/MA and quarterly workplace inspection by OSH committee.</li> <li>3. Kalumpong Estate nominated Muhammad Nur Syafiq bin Rodzi (Assistant Manager) for CePSWaM training which is scheduled on 25 Jun 2018.</li> </ol> <p>The corrective action taken was consistent with root cause analysis. As the finding raised was related to documentation and understanding of person responsible to ensure the schedule waste are managed as per the regulation, the corrective action to have dedicated personnel to be trained will be able to reduce risk of non-compliance.</p> <p>Therefore the Major NC was approved for offsite closure assessment on 20/8/2018</p>
<b>Assessment Conclusion:</b>	<p>Verification during ASA1_3:</p> <p>Light bulbs (SW 110) are now handed over to Chersonese POM since the mill can arrange the competent collector much easier. Evidence of delivery can be seen through a letter (rhp).</p> <p>Hence, the major nonconformance is remained closed.</p>

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1361165M1	Major	6.5.2	29/07/2016	Closed out on 29/9/16
1361165M2	Major	7.1.1	29/07/2016	Closed out on 29/9/16
1361165M3	Major	7.3.2	29/07/2016	Closed out on 29/9/16
1361165M4	Major	7.8.1	29/07/2016	Closed out on 29/9/16
1361165N1	Minor	6.2.3	29/07/2016	Closed out on 16/06/2017
1361165N2	Minor	2.1.4	29/07/2016	Closed out on 16/06/2017
1361165N3	Minor	7.1.2	29/07/2016	Closed out on 16/06/2017
1361165N4	Minor	7.8.2	29/07/2016	Closed out on 16/06/2017
1361165N5	Minor	6.10.3	29/07/2016	Closed out on 16/06/2017
1490713-201706-N1	Minor	5.3.3	16/06/2017	Upgrade to Major NC

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1643002-201805-M1	Major	5.3.3	07/06/2018	Closed out on 20/8/2018
1811307-201904-M1	Major	4.1.1	18/07/2019	Closed out on 04/10/2019
1811307-201904-M2	Major	6.1.3	18/07/2019	Closed out on 04/10/2019
1811307-201904-M3	Major	6.5.1	18/07/2019	Closed out on 04/10/2019
1811307-201904-N1	Minor	4.7.3	18/07/2019	"Open"
1811307-201904-N2	Minor	2.1.3	18/07/2019	"Open"
1811307-201904-N3	Minor	6.5.3	18/07/2019	"Open"
1811307-201904-N4	Minor	4.6.10	18/07/2019	"Open"
1811307-201904-N5	Minor	5.6.3	18/07/2019	"Open"

**3.5. Stakeholders Consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Chersonese Palm Oil Mill Certification Unit’s (SOU 2) environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

<b>List of Stakeholders Contacted</b>	
<b>Internal Stakeholders</b> Workers’ Representatives NUPW representatives Gender committee	<b>Union/Contractors/Local Communities</b> Local Communities’ Representatives Contractors Neighbouring Plantation (Ladang Segar)
<b>Government Departments</b> School Representative	<b>NGO</b> Nil



<b>IS #</b>	<b>Description</b>
<b>1</b>	<b>Feedbacks:</b> Contractors – They informed that payment was made promptly. They have good relationship with the managements and aware the complaint procedure if they have any issues. They were invited to the stakeholder meetings as well.
	<b>Management Responses:</b>

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	<p>Managements will ensure the payment will make promptly.</p> <p><b>Audit Team Findings:</b>  Document reviewed on the payment records found that the payment was made according to the sign agreements.</p>
2	<p><b>Feedbacks:</b>  Local Communities’ Representatives – They are aware of the complaint procedure and informed that local villagers were provided with job opportunity. One of the representative hopes that Holyrood Estate could open the gate for the villagers to access the LAP road to Taiping town.</p>
	<p><b>Management Responses:</b>  The management has communicated to the villagers and authorities for the issue. Currently, they are waiting for further action from authorities.</p>
	<p><b>Audit Team Findings:</b>  Document reviewed on the correspondence from the Land Office dated 19/7/2018 regarding the payment from LAP to the estate. The issue still in progress.</p>
3	<p><b>Feedbacks:</b>  NUPW Representatives – They are aware of the pay and condition. Housing facilities are provided free to the workers. If there is any issue that could not resolve, they know their rights to disseminate the issue to region NUPW office.</p>
	<p><b>Management Responses:</b>  The management will ensure welfare of workers are well taken care of.</p>
	<p><b>Audit Team Findings:</b>  No further issue.</p>
4	<p><b>Feedbacks:</b>  Workers’ Representatives (India, Indonesia, Nepal and Bangladesh) – All the workers are treated equally without any discrimination. They were paid double rate if work on rest day. However, India workers informed that they were paid a different amount of cost to agent before coming to Malaysia.</p>
	<p><b>Management Responses:</b>  The management will ensure all the workers treat equally and pay according to legal requirements. For the agent cost, the management will discuss with HR.</p>
	<p><b>Audit Team Findings:</b>  Please refer to indicator 4.1.1.</p>
5	<p><b>Feedbacks:</b>  Representatives of Gender Committee – They informed that no case of sexual harassment case reported thus far. They are aware of their rights and treated equally without discrimination.</p>
	<p><b>Management Responses:</b>  The managements will ensure the rights of the female employees are well take care.</p>
	<p><b>Audit Team Findings:</b>  No further issue.</p>
6	<p><b>Feedbacks:</b>  Teachers – They have good relationships with the managements. The managements had provided assistance whenever they requested such as tree trimming, donation for school’s activities. They are aware of the complaint procedure.</p>
	<p><b>Management Responses:</b>  The managements will continue to maintain good relationship and provide assistance if permissible.</p>
	<p><b>Audit Team Findings:</b>  No other issue.</p>
7	<p><b>Feedbacks:</b>  Neighbouring Plantation (Ladang Segar) – They have good relationships and corporation with the managements. Trenches and gates were available to demarcate the boundaries.</p>
	<p><b>Management Responses:</b>  The managements will continue to maintain good relationship.</p>

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	<b>Audit Team Findings:</b> No other issue.
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Formal signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Chersonese Palm Oil Mill Certification Unit has complied with the RSPO Principle &amp; Criteria MYNI 2014, RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Chersonese Palm Oil Mill Certification Unit is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> <b>Hu Ning Shing</b>	<b>Name:</b> <b>Azizi Abdul Rahman</b>
<b>Company Name:</b> <b>BSI Services Malaysia Sdn Bhd</b>	<b>Company Name:</b> <b>Sime Darby Plantation Berhad</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> <b>Mill Manager</b>
<b>Signature:</b> 	<b>Signature:</b>  Sime Darby Plantation Berhad KILANG KELAPA SAWIT CHERSONESE ..... (AZIZI ABDUL RAHMAN) MILL MANAGER  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the content of this report and accept the liability in execution of the procedure in the report)</i>
<b>Date: 25/10/2019</b>	<b>Date: 25/10/2019</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>		
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.</p> <p>- Minor compliance -</p> <p>Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE quarterly reports were attended and no noncompliance or complaints observed. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making.</p> <p>Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans &amp; Continuous Improvement Plans and company policies are available.</p> <p>Sime Darby has published its sustainable policies, annual report and Code of Business Conduct in the Sime Darby Plantation Berhad website.  <a href="http://www.simedarbyplantation.com/corporate">http://www.simedarbyplantation.com/corporate</a>;  <a href="http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies">http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies</a></p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The procedure for handling request for information is stated in Section 3 – Documentation and Communication of the Plantation Quality Management System Manual dated 01/11/2008.  Ever since the last assessment, there was no request for information to the mill and sampled estates from relevant stakeholders.	Complied
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn. Bhd. website as following link: <a href="http://www.simedarbyplantation.com/sustainability/beliefsprogress/human-rights/labour-standards/grievancemechanisms">http://www.simedarbyplantation.com/sustainability/beliefsprogress/human-rights/labour-standards/grievancemechanisms</a> Sample of the documents that were made available for viewing are: <ul style="list-style-type: none"> <li>• Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</li> <li>• Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</li> <li>• Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE</li> </ul>	Complied
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.			



Criterion / Indicator		Assessment Findings	Compliance
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpang Estate and 7/12/2018 in Tali Ayer Estate.	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>SOU2 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU8 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p><b>CPOM:</b></p> <ol style="list-style-type: none"> <li>1. MPOB license: 533667104000 (validity period 1/11/2018-31/10/2019) for 192,000 MT.</li> <li>2. DOE License: 004229 (validity period 01/07/2019 - 30/06/2020).</li> <li>3. Diesel Permit # A000652, ref KPDNKK.PBR.003.SK(P/D)020/2008, (07/5/2019-6/5/2020), Quantity: 10,000 liter.</li> <li>4. Energy commission license no: 2019/00445; serial no: 34541 (validity period 18/2/2019 – 17/2/2020).</li> <li>5. DOE Written Approval for Biogas Plant – AS(B)A91/110/991/003 Jld.6(3)</li> <li>6. CF for boiler #PMD8698 valid until 18/6/2020</li> <li>7. CF for deaerator header #PK PMT 583 valid until 18/6/2020</li> </ol> <p><b>CE:</b></p> <ol style="list-style-type: none"> <li>1. MPOB license: 532370011000 (validity period 01/9/2018-31/8/2019).</li> <li>2. MPOB license: 526593002000 (validity period 1/2/2018-31/1/2020)</li> <li>3. Diesel Permit # A000004-PBR, ref KPDNKK.PBR.003/SK(P/D)037/2008, (validity 17/1/2019-16/1/2020), Quantity: 9,000 liter.</li> <li>4. Petrol (Ron95) Permit #A000114-PBR, ref KPDNKK.PBR.SKK(P/D)002/2017, (validity 6/3/2019-5/9/2019), Quantity: 200 Liter</li> <li>5. CF for air receiver #PK PMT 7991, (validity until 18/12/2019)</li> </ol>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p><b><u>Holyrood Estate:</u></b></p> <ol style="list-style-type: none"> <li>1. MPOB License: 530733002000 (validity 1/7/2019-30/6/2020)</li> <li>2. Diesel permit: #A033781, ref KPDNKK.TPG.003/PB/(PD)044/16-(BL22018044515), validity until 15/12/2019, quantity: 6,000 Liter</li> <li>3. CF for air receiver #PK PMT 5004, (validity until 26/11/2019)</li> </ol> <p><b><u>Kalumpang Estate:</u></b></p> <ol style="list-style-type: none"> <li>1. MPOB license: 524392002000 (validity period 01/11/2018 – 31/12/2019) and 542021011000 (validity period 01/9/2018-31/8/2019).</li> <li>2. Diesel Permit # A000003-PBR, ref KPDNKK.PBR.003.SK (P/D)001/2011, (17/01/2019-16/01/2020), Quantity: 10,000 liter.</li> <li>3. CF for air receiver #PK PMT4079, expiry 3/9/2019</li> </ol> <p><b><u>Tali Ayer Estate:</u></b></p> <ol style="list-style-type: none"> <li>1. MPOB License: 508238502000 (validity 1/2/2019-31/1/2020)</li> <li>2. Diesel permit is in progress of renewal. Waiting inspection from BOMBA. The letter from KPDNHEP dated 28/6/19 was sighted.</li> <li>3. CF for air receiver #PK PMT512 expiry on 29/1/2020</li> </ol> <p>Sime Darby Plantation Berhad has applied permit for deduction of electricity and seen the approval letter with Ref. No.: BHG.PU/9/129 JLD38(53) dated 6/7/2017. Besides, approval for maximum overtime of 130 hours from JTK Semenanjung Malaysia was sighted. Seen the approval letter with Ref. No.: BHG.PU/9/134 JLD 9(11) dated 27/3/2017.</p> <p>Tali Ayer Estate has obtained approval from JTK Negeri Perak for the deduction of water usage from workers. Seen the approval letter with Ref. No.: JTK.PK.(1)PMT(SEK.24)10802 Jld. 15 (22) dated 1/2/2019.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	SOU2 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008	Complied

Criterion / Indicator	Assessment Findings	Compliance															
<p>2.1.3 A mechanism for ensuring compliance shall be implemented.                      - Minor compliance -</p>	<p>Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated from the Group Head Office.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p> <p>As per the approval from JTK for the maximum overtime of 130 hours per month, the workers are not allowed to work more than 4 hours of overtime if work on rest day, public holiday and replacement of public holiday. However, document reviewed on the Daily Input Form in Chersonese POM found that the following workers worked more than 4 hours during work on rest day.</p> <table border="1" data-bbox="981 847 1854 1098"> <thead> <tr> <th>Employee No.</th> <th>Date</th> <th>Hours of Overtime</th> </tr> </thead> <tbody> <tr> <td>132397</td> <td>30/12/2018</td> <td>12</td> </tr> <tr> <td>88313</td> <td>30/12/2018</td> <td>12</td> </tr> <tr> <td>122299</td> <td>30/12/2018</td> <td>12</td> </tr> <tr> <td>79268</td> <td>06/01/2019</td> <td>8</td> </tr> </tbody> </table> <p>Chersonese Estate, Holyrood Estate, Kalumpong Estate and Chersonese POM are in the midst of application of permit for deduction of salary for water usage (CE: submitted on 12/7/2019; HE: received email from MOHR on 8/7/2019 for more documents; KE: submitted on 13/3/2019). However, they continue to deduct the salary of workers for the sampled months of October 2018, December 2018, January 2019, March 2019 and June 2019. Thus, a minor NC raised.</p>	Employee No.	Date	Hours of Overtime	132397	30/12/2018	12	88313	30/12/2018	12	122299	30/12/2018	12	79268	06/01/2019	8	<p>Minor nonconformance</p>
Employee No.	Date	Hours of Overtime															
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Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.	Complied
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			

Criterion / Indicator	Assessment Findings	Compliance
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>The estate operation is on freehold and leasehold land. Land titles and copy of land titles were available during the audit.</p> <p>Chersonese Estate land titles and quit rent were sighted for 2,144.8662Ha:</p> <ol style="list-style-type: none"> <li>1. Grant No: 59095, (Lot #3221)</li> <li>2. Grant No: 50936, (Lot #3435)</li> <li>3. Grant No: 27336, (Lot #3229)</li> </ol> <p>Holyrood Estate land titles and quit rent were sighted:</p> <ol style="list-style-type: none"> <li>1. Grant No: 85423, (Lot #781)</li> <li>2. Grant No: 48660, (Lot #1457)</li> <li>3. Grant No: 85424, (Lot #2044)</li> <li>4. Grant No: 58413, (Lot #2330)</li> </ol> <p>Holyrood Estate land titles and quit rent were sighted:</p> <ol style="list-style-type: none"> <li>1. Grant No: 52824, (Lot #3026)</li> <li>2. Grant No: 6887, (Lot #7658)</li> <li>3. Grant No: 81187, (Lot #9159)</li> <li>4. Grant No: 81186, (Lot #9158)</li> </ol> <p>Tali Ayer Estate land titles and quit rent were sighted:</p> <ol style="list-style-type: none"> <li>1. Grant No: 45057, (Lot #1331)</li> <li>2. Grant No: 38693, (Lot #1332)</li> <li>3. Grant No: 51907, (Lot #1333)</li> <li>4. Grant No: 38694, (Lot #1334)</li> </ol>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Legal boundaries are clearly demarcated and visibly maintained throughout the estate.  At Chersonese Estate, the security trenches were constructed. At Holyrood Estate, the boundary was clearly demarcated (Boundary Field 10A with Ladang Segar). At Kalumpong Estate, the boundary was clearly demarcated (Boundary Field 06A2 with smallholder).	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied



Criterion / Indicator		Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the SOU 2 at the time of audit. The land belongs to Sime Darby Plantation Berhad and some leased it directly from the government verified through land ownership documents. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied

Criterion / Indicator		Assessment Findings	Compliance																							
<b>Principle 3: Commitment to long-term economic and financial viability</b>																										
<b>Criterion 3.1:</b>																										
There is an implemented management plan that aims to achieve long-term economic and financial viability.																										
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	SOU2 had an annual budget for the financial year 2019. The palm oil mill budget includes the projected FFB processed, CPO and PK production which projected for five years. Sighted for both estate (MPLAN_2019) from the FY 2019 until FY 2023 to include upkeep mature cost, oil palm harvesting and collection cost, oil palm transport cost and oil palm manuring cost.	Complied																							
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>The replanting programme was established. Sighted Replanting Programme 2016-2024:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Chersonese Estate</td> <td>2019</td> <td>270.35</td> </tr> <tr> <td>2020</td> <td>186.62</td> </tr> <tr> <td rowspan="2">Holyrood Estate</td> <td>2019</td> <td>97.27</td> </tr> <tr> <td>2020</td> <td>57.06</td> </tr> <tr> <td rowspan="3">Kalumpang Estate</td> <td>2019</td> <td>376.51</td> </tr> <tr> <td>2020</td> <td>121.46</td> </tr> <tr> <td>2021</td> <td>104.81</td> </tr> <tr> <td>Tali Ayer Estate</td> <td>2021</td> <td>46.35</td> </tr> </tbody> </table>	Estate	Year	Ha	Chersonese Estate	2019	270.35	2020	186.62	Holyrood Estate	2019	97.27	2020	57.06	Kalumpang Estate	2019	376.51	2020	121.46	2021	104.81	Tali Ayer Estate	2021	46.35	Complied
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<b>Principle 4: Use of appropriate best practices by growers and millers</b>																										
<b>Criterion 4.1:</b>																										
Operating procedures are appropriately documented, consistently implemented and monitored.																										

Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented                      - Major compliance -</p>	<p>Interviewed with the workers from India found that they had to pay to agent in their home country before came to Malaysia. The amount they paid were about 30,000 – 120,000 rupees. Document reviewed on the Declaration by Manpower Agents dated 13/10/2017 found that the cost of workers paid to agents and sub-agents is 36,073 rupees. Sime Darby Plantation Berhad has developed Workforce Management Unit Liaison &amp; Recruitment (LR) Procedure with Doc. No. WMU/LR-SOPP/MARCH2016, rev. 0 dated 30/3/2016. However, there is no clear procedure to show the monitoring demonstrated by the company to ensure the agents and/or the contractors are fulfilling the agreement. Thus, a major NC raised.</p> <p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs:</p> <ol style="list-style-type: none"> <li>1. Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</li> <li>2. Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilisation station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant.</li> </ol> <p>Estates have a separate SOP which is SOP EQMS, Pictorial Safety Standard, Estate Quality Management System and Agricultural reference Manual that covered planting material, nursery techniques, replanting, land preparation, planting density, canopy management, water management, harvesting, loose fruit collection, weed control and transport.</p>	<p>Major nonconformance</p>

<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>There is an audit conducted by planning and monitoring department to confirmed consistent records of implementation of SOPs. During mill visit it was noted that that operating parameters were consistently recorded by the operators. The following are rating given by internal and external at SOU 2:</p> <p><u>Chersonese Estate(April 2019)</u> Immature Assessment = 3.7 Nursery Assessment = 3.8 Manuring Assessment = 4.3 Building &amp; Facilities Management = 4.5 EVIT = 3.6 Ex-estate Cost = 1.2</p> <p><u>Holyrood Estate(April 2019)</u> Immature Assessment = 4.0 Manuring Assessment = 4.3 Building &amp; Facilities Management = 4.8 EVIT = 3.7 Ex-estate Cost = 4.7</p> <p><u>Kalumpong Estate (April 2019)</u> Immature Assessment = 4.0 Nursery Assessment = 3.7 Manuring Assessment = 4.1 Building &amp; Facilities Management = 4.5 EVIT = 3.5 Ex-estate Cost = 1.0</p> <p><u>Tali Ayer Estate(April 2019)</u> Immature Assessment = 3.2 Manuring Assessment = 4.2</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Building & Facilities Management = 4.4 EVIT = 4.0 Ex-estate Cost = 1.0	
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All records of monitoring were maintained and available at mill and estate office.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No third party sourced FFB at Chersonese POM	Complied
<b>Criterion 4.2:</b>			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained.            - Minor compliance -</p>	<p>Chersonese Estate:            The records of agronomic and fertilizer recommendation report by agronomist shown application date, filed number, dosage applied per palm, type of fertilizer and number of application. Sampled fertilizer recommendation for field 05CA, MOP (1.25kg/palm) was complete.</p> <p>Holyrood Estate:            The records of agronomic and fertilizer recommendation report dated 15/10/2018 by agronomist shown application date, filed number, dosage applied per palm, type of fertilizer and number of application. Sampled fertilizer recommendation for field 2010A, MOP (1.50kg/palm) was complete.</p> <p>Kalumpong Estate:            The records of agronomic and fertilizer recommendation report by agronomist shown application date, filed number, dosage applied per palm, type of fertilizer and number of application. Sampled fertilizer recommendation for field 01A1, MOP (1.50kg/palm) was complete.</p> <p>Tali Ayer Estate:            The records of agronomic and fertilizer recommendation report by agronomist shown application date, filed number, dosage applied per palm, type of fertilizer and number of application. Sampled fertilizer recommendation for field 2012A, AC (1.75kg/palm) was complete.</p>

Criterion / Indicator		Assessment Findings	Compliance																
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Chersonese Estate: Latest plant analysis was done during agronomist visit. Soil sampling and analysis was last done on 7/6/2018. Sighted Soil Analysis Test Report (S30/2018) dated 8/6/2018.</p> <p>Holyrood Estate: Latest plant analysis was done during agronomist visit. Soil sampling and analysis was last done on 24/4/2018. Sighted Soil Analysis Test Report (S35/2018) dated 11/6/2018.</p> <p>Kalumpong Estate: Latest plant analysis was done during agronomist visit. Soil sampling and analysis was last done on 5/3/2015. Sighted Soil Analysis Test Report (S31/2015) dated 17/4/2015.</p> <p>Tali Ayer Estate: Latest plant analysis was done during agronomist visit on 21-22/11/2018. Soil sampling and analysis was last done on 19/11/2018. Sighted Soil Analysis Test Report (S1/2019) dated 2/1/2019.</p>	Complied																
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>All palm by-products including fronds, EFB are recycled. EFB is applied for immature area and as per agronomic and fertilizer recommendation.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Tonnage</th> <th>Type</th> <th>Year</th> </tr> </thead> <tbody> <tr> <td>Chersonese Estate</td> <td>4.160 mt</td> <td>EFB</td> <td>2019</td> </tr> <tr> <td>Kalumpong Estate</td> <td>26.058 mt</td> <td>EFB</td> <td>2019</td> </tr> <tr> <td>Tali Ayer Estate</td> <td>28.777 mt</td> <td>EFB</td> <td>2019</td> </tr> </tbody> </table>	Estate	Tonnage	Type	Year	Chersonese Estate	4.160 mt	EFB	2019	Kalumpong Estate	26.058 mt	EFB	2019	Tali Ayer Estate	28.777 mt	EFB	2019	Complied
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Criterion / Indicator		Assessment Findings	Compliance																								
<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.																											
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for all estates visited. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at all estate. <table border="1" data-bbox="981 555 1615 963"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr><td>1</td><td>Sabrang</td></tr> <tr><td>2</td><td>Briah</td></tr> <tr><td>3</td><td>Perepat</td></tr> <tr><td>4</td><td>Sedu</td></tr> <tr><td>5</td><td>Parit Botak</td></tr> <tr><td>6</td><td>Jawa</td></tr> <tr><td>7</td><td>Serkat</td></tr> <tr><td>8</td><td>Holyrood</td></tr> <tr><td>9</td><td>Rasau</td></tr> <tr><td>10</td><td>Sungei Buloh</td></tr> <tr><td>11</td><td>Telemong</td></tr> </tbody> </table>	No.	Type of Soil	1	Sabrang	2	Briah	3	Perepat	4	Sedu	5	Parit Botak	6	Jawa	7	Serkat	8	Holyrood	9	Rasau	10	Sungei Buloh	11	Telemong	Complied
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4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Soil slope and contour map available for all estates visited. There were no slope above 25° at all estate visited.	Complied																								
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates has implemented annual road maintenance programme. Example of programme checked at both estates shows the map indicating road repairs and maintenance for the whole estate roads includes resurfacing and grading. Sighted the records of road maintenance at both estates. Verified during site visit, found that the road were in good condition.	Complied																								

Criterion / Indicator		Assessment Findings	Compliance
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.1 An implemented water management plan shall be in place.                      - Minor compliance -</p>	<p>The water management plan for both mill and estates have been established for FY2019. Generally, the plans were focusing on:</p> <ul style="list-style-type: none"> <li>• Management of wastewaters                          e.g. of action plans: reusing of water at pre-mixing chemical area, oil trap at workshop, septic tank</li> <li>• Reduction of fresh water usage                          e.g. of action plans: rainwater collection, awareness among employees on water saving (recorded in the "Laporan Muster MA Main Division" dated 16/2/2019), maintenance of piping system</li> <li>• Contingency plan during water shortage                          e.g. of action plans: to purchase water from Perak Water Board, to train staff/workers in saving water</li> </ul> <p>The SOP for taking water samples from stream/rivers was based on Sime Darby Plantation's Sustainable Plantation Management System Ver. 2 1/6/2016 Appendix 7, especially for monitoring as well as other requirement by respective operating units.</p> <p>Tali Ayer Estate: In its water management plan, there is an intention to reduce water consumption by giving awareness to the workers and ensure no leakages in the piping system.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.4.2</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.</p> <p>- Major compliance -</p> <p>Among the water management plan established by the estates in order to protect the water courses were:</p> <ul style="list-style-type: none"> <li>• reusing water residue from agrochemical pre-mixing and PPE washing activities</li> <li>• installation of oil trap at workshop drainage</li> <li>• maintenance of septic tanks</li> </ul> <p>Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="981 719 1615 922"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 1/11/2008. This can be evident through verification of water analysis test report for upstream, mid-stream and downstream rivers crossing the estates, e.g. report no. IE470/2019 dated 3/5/2019 (Kalumpang), no. IE461/2019 &amp; IE460/2019 dated 29/4/2019 (Tali Ayer). Among the parameters analysed were pH, BOD, COD, SS, AN, DS and P. Whenever off specs result is obtained, from WQ-01/CPAR(1), (2) &amp; (3) are used to record the identified root cause and corrective action taken. Based on the report, the results were generally within the parameter limits.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	The mill applies the biological system with multiple ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD=43 ppm while lowest = 14 ppm were recorded. The results complied with the regulated requirement i.e. 50 ppm. About 50% of the effluent was used for composting plant extracted from Acidification Pond #2.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. An average of 1.17 m <sup>3</sup> water is used to process per mt of FFB recorded from Jan to Aug 2019.	Complied
<b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls Tyto Alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there is no outbreak of leaf eating pest. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus. It was noted that the census interval for barn owl occupancy was as per Sime Darby SOP in Agricultural Reference Manual v.1 Section 15.</p> <p><u>Barn Owl Occupancy Rate:</u>            Chersonese Estate – Occupancy Rate: 100%            Holyrood Estate – Occupancy Rate: 64%            Kalumpong Estate – Occupancy Rate: 73%            Tali Ayer Estate – Occupancy Rate: 46%</p>	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training was given by the Agronomist and plantation executives with qualification in agriculture. Interview with the team confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census.</p> <p>#cross refer with indicator 4.8.2</p>	Complied
<p><b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment</p>			

Criterion / Indicator		Assessment Findings	Compliance																										
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease.	Complied																										
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <table border="1"> <thead> <tr> <th>Chemical Name</th> <th>Active Ingredient (a.i)</th> </tr> </thead> <tbody> <tr> <td>Canyon</td> <td>Metsulforon Methyl</td> </tr> <tr> <td>Tarang</td> <td>Glufosinate Ammonium</td> </tr> <tr> <td>Basta</td> <td>Glufosinate ammonium</td> </tr> <tr> <td>Kenlon</td> <td>Triclopyr butoxy</td> </tr> <tr> <td>Allion</td> <td>Indaziflam</td> </tr> <tr> <td>Amine</td> <td>Dimethyl Ammonium</td> </tr> <tr> <td>Sodium Chlorate</td> <td>Sodium Chlorate</td> </tr> </tbody> </table> <p>The record of pesticides used was sighted.</p> <table border="1"> <thead> <tr> <th></th> <th>June 19</th> </tr> </thead> <tbody> <tr> <td>Chersonese Estate</td> <td>1.40 % a.i/ha</td> </tr> <tr> <td>Holyrood Estate</td> <td>0.56 % a.i/ha</td> </tr> <tr> <td>Kalumpong Estate</td> <td>0.42 % a.i/ha</td> </tr> <tr> <td>Tali Ayer Estate</td> <td>1.15 % a.i/ha</td> </tr> </tbody> </table>	Chemical Name	Active Ingredient (a.i)	Canyon	Metsulforon Methyl	Tarang	Glufosinate Ammonium	Basta	Glufosinate ammonium	Kenlon	Triclopyr butoxy	Allion	Indaziflam	Amine	Dimethyl Ammonium	Sodium Chlorate	Sodium Chlorate		June 19	Chersonese Estate	1.40 % a.i/ha	Holyrood Estate	0.56 % a.i/ha	Kalumpong Estate	0.42 % a.i/ha	Tali Ayer Estate	1.15 % a.i/ha	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5	Complied
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Paraquat was eliminated. At the time of assessment there was no class 1a or 1b pesticide. Alternatives such as Glyphosate were used with the elimination of Paraquat.	Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers. #cross refer with indicator 4.8.2	Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied



Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at all estates.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	There is no associated smallholder at Chersonese POM Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures.  #cross refer with indicator 4.8.2	Complied

<p>4.6.10</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -</p>	<p>Proper disposal of waste material are carried out as per the company procedures. Established as Environmental Improvement Plan/Pollution Plan; Mill: KKS Chersonese; Period: 2018 (Jan – Dec). The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management of waste material disposal such as empty chemical container as in accordance with scheduled waste and domestic waste regulations and guidelines.</p> <p>Chersonese and Kalumpong estates have set up domestic wastes collection centre at Block 01C and 14C respectively before sending it to landfill under Kerian District Council. At Chersonese, the rubbish from the residential areas is first dumped on the ground and thereafter filled in a bin by backhoe. It was observed that the dumping ground was just situated next to a field drain which end is connected to Kurau River. EIA showed that this activity has yet to be assessed and therefore aspects like leachate flowing to the field drain and solid wastes fell into the drain were not captured, although these aspects could be observed on site.</p> <p>The collected solid wastes at Chersonese and Kalumpong estates are sent to the landfill that managed by the Majlis Daerah Kerian (Kerian District Council). The delivery of the waste can be evident through receipt issued by the council e.g. Bill No. 07100006, dated 10/7/2019 (Chersonese), No. 06060016 dated 6/6/2018 (Kalumpong) and No. 07010032 dated 1/7/2019 (Tali Ayer). However, for Kalumpong, the bill is the last one available. There is no bill issued KDC since July 2018. Thus, the whereabouts of the rubbish from the collection bin was brought is not clear.</p> <p>Based on verification of landfill and domestic wastes bin at the collection centres of all estates, it was observed that recyclable wastes such as plastic and metal were also dumped there. The recycle bins with colour code at</p>	<p>Minor nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>various areas were also not effectively utilised. It was observed that mixture of wastes were found inside the recycle bins. Thus, a minor non-conformance was raised.</p>	

Criterion / Indicator		Assessment Findings				Compliance																																				
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated.</p> <p>Medical examination programme established for sprayers which conducted by Klinik Vijay Sdn Bhd for Chersonese Estate, Tali Ayer Estate and Kalumpong Estate, Poliklinik Sakthi N Sheila for Holyrood Estate</p> <table border="1"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>102032</td> <td rowspan="3">24/10/2018</td> <td>Fit</td> <td rowspan="3">Chersonese Estate</td> </tr> <tr> <td>116702</td> <td>Fit</td> </tr> <tr> <td>102043</td> <td>Fit</td> </tr> <tr> <td>117776</td> <td rowspan="3">22/5/2018</td> <td>Fit</td> <td rowspan="3">Holyrood Estate</td> </tr> <tr> <td>131146</td> <td>Fit</td> </tr> <tr> <td>131144</td> <td>Fit</td> </tr> <tr> <td>53860</td> <td rowspan="3">14/6/2019</td> <td>Fit</td> <td rowspan="3">Kalumpong Estate</td> </tr> <tr> <td>147331</td> <td>Fit</td> </tr> <tr> <td>147329</td> <td>Fit</td> </tr> <tr> <td>125763</td> <td rowspan="3">12/6/2018</td> <td>Fit</td> <td rowspan="3">Tali Ayer Estate</td> </tr> <tr> <td>129585</td> <td>Fit</td> </tr> <tr> <td>104308</td> <td>Fit</td> </tr> </tbody> </table>				ID No	Date of Medical check up	Result	Estate	102032	24/10/2018	Fit	Chersonese Estate	116702	Fit	102043	Fit	117776	22/5/2018	Fit	Holyrood Estate	131146	Fit	131144	Fit	53860	14/6/2019	Fit	Kalumpong Estate	147331	Fit	147329	Fit	125763	12/6/2018	Fit	Tali Ayer Estate	129585	Fit	104308	Fit	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There was no female sprayer/pesticide operator at all estate.	Complied
<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.          - Major compliance -</p>	<p>The OSH policy signed by the managing director dated January 2015 was in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139). The policy and plan had been communicated and implemented.</p> <p>The plan 2019 covered awareness of safe working &amp; living environment and legal compliance. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. The latest ESH plan objective 2019 was made available during this assessment.</p> <p>The plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE and OSH Committee meetings.</p> <p><b><u>Chemical Health Risk Assessment (CHRA)</u></b>  <b>Chersonese POM</b> - CHRA was conducted on 30/7/15 &amp; 7/8/2015 by registered assessor JKPP HIE 127/171-2(129), Global Advance Training and Consultancy.</p> <p><b>Chersonese Estate</b> - CHRA was conducted on 16/10 &amp; 17/11/2015 (Main Assessment) and 27/4/2017 (Additional Assessment) by registered assessor JKPP HIE 127/171-2(129), Global Advance Training and Consultancy.</p> <p><b>Holyrood Estate</b> - CHRA was conducted on 5/4/2017 by registered assessor JKPP HIE 127/171-2(129), Global Advance Training and Consultancy.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p><b>Kalumpang Estate</b> – CHRA was conducted on 3/7/15 and 12/8/15 by registered assessor JKPP HIE 127/171-2(129), Global Advance Training and Consultancy.</p> <p><b>Tali Ayer Estate</b> – CHRA was conducted on 9/9/2015 by registered assessor JKPP HIE 127/171-2(129), Global Advance Training and Consultancy.</p> <p><b><u>Local Exhaust Ventilation Testing</u></b> The LEV testing was last conducted on 1/4/2019 by Renzo Ventures Connecting Safety (HQ/II/JHII/00/173-2019/042). From the report, stated that KKS Chersonese have met the ACGIH standard requirement and complied with the USECHH 2000 Regulation.</p> <p><b><u>Initial Personal Chemical Exposure Monitoring</u></b> The CEM was last conducted on 23/4/2018 by Renzo Ventures Connecting Safety (HQ/12/JH1/00/178-20178/23). From the report, the concentration of airborne contaminant inhalable particulate were within permissible exposure limit (PEL) as specified in Schedule 1 of Occupational Safety and Health (USECHH) Regulation 2000.</p> <p><b><u>Audiometric Test</u></b> The audiometric test was conducted 19/11/2018 by earwright services &amp; consultants (HQ/08/DOC/00/491) for 65 employees. From the report, found that 6 employees were found to have hearing impairment at different levels and 1 employees was found to have standard threshold shift. The repeat test was conducted on 10/2/2019 at Klinik Vijay Sdn Bhd. Based on the repeat test report, the OHD advised to repeat audiogram after three month.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>SOU2 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Appropriate control measure has been determined and revised in the HIRARC register.</p> <p>Risk of operations had been assessed and HIRARC document produced at Chersonese Estate. It was updated and reviewed on 26/6/2019.</p> <p>Risk of operations had been assessed and HIRARC document produced at Tali Ayer Estate. It was updated and reviewed on 27/6/2019 after the accident happened for loose fruit collection activity.</p> <p>Risk of operations had been assessed and HIRARC document produced at Kalumpong Estate. It was updated and reviewed on 20/07/18.</p> <p>Risk assessment had been carried out on all operations where health and safety were of concern by the HIRARC committee and documented in the HIRARC document. The HIRARC was reviewed on 7/7/19 at CPOM.</p>	<p>Complied</p>



Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. The records of PPE issuance were sighted.</p> <p>SOP of handling of chemicals is available. The document was dated 26/02/2017 titled "chemical safety management". Therein is shown requirement &amp; selection of chemicals, assessment of chemicals hazards, selections of supplier and transportation of chemicals. Storage, handling and training of such is also stated therein.</p> <p>#cross refer with indicator 4.8.2</p> <p>However, the PPE implementation at Composting Plant (Eg: Mask and glove) was not implemented effectively. Thus, the minor NCR was raised.</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p>SOU2 OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work.</p> <p><b><u>Chersonese Estate</u></b>            OSH meeting was conducted on quarterly. OSH/EHS meeting: 27/6/2019, 29/3/2019, 24/12/2019 and 24/9/2019.</p> <p><b><u>Chersonese POM</u></b>            OSH meeting was conducted on quarterly. OSH/EHS meeting: 11/5/19, 11/2/19, 8/11/18</p> <p><b><u>Holyrood Estate</u></b>            OSH meeting was conducted on quarterly. OSH/EHS meeting: 22/4/19, 14/1/19, 26/11/18.</p> <p><b><u>Kalumpong Estate</u></b>            OSH meeting was conducted on quarterly. OSH/EHS meeting: 14/6/19, 20/3/19, 21/12/18, 20/7/18.</p> <p><b><u>Tali Ayer Estate</u></b>            OSH meeting was conducted on quarterly. OSH/EHS meeting: 30/4/19, 31/1/19, 1/11/18, 24/10/18</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures are available. There is a formation of ERP Team &amp; ERP for all the identified incidences. The organisation chart for the ERP team was appointed and displayed for information of the employees.</p> <p>At CPOM, Drill for chemical spillage was conducted on 9/1/19. In-house first aid training was conducted on 7/12/2018 by estate HA.</p> <p>Workers trained in First Aid were present in field operations. Chersonese Estate had 19 trained First Aiders by HA. The latest first aid training was conducted on 18/9/2018.</p> <p>Chersonese Estate - Fire evacuation drill was last conducted on 25/6/2019 to test the state of readiness during emergency situation.            Kalumpong Estate – Fire drill was conducted on 25/4/2018.            Tali Ayer Estate – Fire drill was conducted on 17/4/2019.</p>	<p>Complied</p>
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form for April 19, May 19 and June 19 for all estate visited.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance												
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings.</p> <p>Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 &amp; 8. Sample of accident statistic as shown below :</p> <table border="1"> <thead> <tr> <th>Year</th> <th>CPOM</th> <th>HE</th> <th>KE</th> <th>CE</th> <th>TAE</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>60</td> <td>28</td> <td>17</td> <td>7</td> <td>138</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	CPOM	HE	KE	CE	TAE	2018	60	28	17	7	138	Complied
Year	CPOM	HE	KE	CE	TAE										
2018	60	28	17	7	138										
<p><b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.</p>															

<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.          - Major compliance -</p>	<p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>12/7/19</td> <td>Spraying</td> <td rowspan="4">Chersonese Estate</td> </tr> <tr> <td>11/7/19</td> <td>Rat baiting</td> </tr> <tr> <td>14/8/18</td> <td>Scheduled waste</td> </tr> <tr> <td>27/6/19</td> <td>Policies training</td> </tr> <tr> <td>28/8/18</td> <td>MTG Grabber Training</td> <td rowspan="6">Holyrood Estate</td> </tr> <tr> <td>8/6/19</td> <td>Safe Driving Technique</td> </tr> <tr> <td>3/5/19</td> <td>EFB Application</td> </tr> <tr> <td>5/5/18</td> <td>HCV Briefing</td> </tr> <tr> <td>19/4/19</td> <td>Manuring</td> </tr> <tr> <td>15/1/19</td> <td>Spraying</td> </tr> <tr> <td>15/11/19</td> <td>Pruning &amp; Harvesting</td> <td rowspan="5">Kalumpong Estate</td> </tr> <tr> <td>6/5/19</td> <td>Harvesting</td> </tr> <tr> <td>3/1/19</td> <td>Spraying</td> </tr> <tr> <td>5/12/18</td> <td>Manuring</td> </tr> <tr> <td>10/4/19</td> <td>P&amp;D</td> </tr> <tr> <td>1/6/19</td> <td>First Aid Training</td> <td rowspan="7">Tali Ayer Estate</td> </tr> <tr> <td>19/4/19</td> <td>First Aid Training</td> </tr> <tr> <td>12/1/19</td> <td>Chemical spillage</td> </tr> <tr> <td>12/9/18</td> <td>Tractor driving</td> </tr> <tr> <td>28/8/18</td> <td>IPM Training</td> </tr> <tr> <td>7/12/18</td> <td>HCV</td> </tr> <tr> <td>25/7/18</td> <td>Spraying</td> </tr> <tr> <td>1/8/18</td> <td>Manuring</td> <td rowspan="3">Chersonese POM</td> </tr> <tr> <td>9/7/19</td> <td>RSPO and Operation Briefing</td> </tr> <tr> <td>21/6/19</td> <td>Supply Chain Training</td> </tr> <tr> <td>8/4/19</td> <td>Safety Townhall</td> <td></td> </tr> </tbody> </table>	Date	Training	Remark	12/7/19	Spraying	Chersonese Estate	11/7/19	Rat baiting	14/8/18	Scheduled waste	27/6/19	Policies training	28/8/18	MTG Grabber Training	Holyrood Estate	8/6/19	Safe Driving Technique	3/5/19	EFB Application	5/5/18	HCV Briefing	19/4/19	Manuring	15/1/19	Spraying	15/11/19	Pruning & Harvesting	Kalumpong Estate	6/5/19	Harvesting	3/1/19	Spraying	5/12/18	Manuring	10/4/19	P&D	1/6/19	First Aid Training	Tali Ayer Estate	19/4/19	First Aid Training	12/1/19	Chemical spillage	12/9/18	Tractor driving	28/8/18	IPM Training	7/12/18	HCV	25/7/18	Spraying	1/8/18	Manuring	Chersonese POM	9/7/19	RSPO and Operation Briefing	21/6/19	Supply Chain Training	8/4/19	Safety Townhall		<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
		19/1/19	Chemical Spillage	
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement.		Complied
<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>				
<b>Criterion 5.1:</b> Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.				
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	The assessment of environmental impact is documented in the following documents: <ul style="list-style-type: none"> <li>• Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</li> <li>• Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</li> <li>• Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE</li> </ul>		Complied

Criterion / Indicator	Assessment Findings	Compliance								
<p>5.1.2</p>	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.                      - Minor compliance -</p> <p>Environment Aspect and Impact Identification for various activities- construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop.                      After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="981 687 1870 855"> <thead> <tr> <th colspan="2">Guidance of Action required</th> </tr> </thead> <tbody> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> <tr> <td>250 and above</td> <td>To develop environmental objective and programme</td> </tr> </tbody> </table> <p>Mitigation measures were documented in Pollution Preventive Plan (PPP). Among the environmental issues identified at are:</p> <ul style="list-style-type: none"> <li>• Leakage of pesticides during chemical premixing and washing direct contact to land</li> <li>• Leakage of lubricant fluids from aged vehicles parked at parking bay</li> <li>• Uncollected scheduled wastes exceed 190 days or 20 mt and against the EQA regulations</li> </ul>	Guidance of Action required		100 ~ 199	No action required	200 ~ 249	To initiate corrective and preventive actions	250 and above	To develop environmental objective and programme	<p>Complied</p>
Guidance of Action required										
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Criterion / Indicator		Assessment Findings	Compliance
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	Updating of the progress of plan is carried out by the assistant managers and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental management plan and reviewed from time to time.  Nonetheless, the management of PKO storage (located under FFB ramp) can be further improved by ensuring the effectiveness of the concrete perimeter bund in preventing the kernel oil from spilling to the environment (OFI).	Complied
<b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	Information of High Conservation Value (HCV) available in the HCV Re-Assessment Final Report; Version 2.0; September 2016 for Strategic Operating Unit (SOU) 2 Chersonese. The HCV assessment was conducted by personnel from PSQM Department of Sime Darby Plantation Sdn. Bhd. reported a total of 83.39 ha HCV area within SOU 2. The info available in this latest assessment report complements the info from Biodiversity Baseline Assessment Report dated back in February 2009.	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	The report specified that no any IUCN species exists within SOU area except for birds species that often migrated through Kuala Gula river nearby SOU 2 estates.	Complied



Criterion / Indicator		Assessment Findings	Compliance
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	The program to regularly educate the workforce was established and incorporated with the annual training programme. HCV Training was conducted on 27/6/2019 (Chersonese), 11/7 & 18/6/2019 (Holyrood) where training records were well maintained and made available for verification.	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> - Minor compliance -	Monitoring of HCV and Conservation Areas (patrol records) was incorporated with HCV Management Plan at all the visited estates. E.g. of Objectives & Target being implemented: - To keep maintain buffer zone marker with white paint - To install the signage at site and retrievable on map (HCV4) - To conduct buffer zone training for sprayers. - Field maps river and boundary stone.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There is no HCV set-asides with existing rights of local communities.	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator	Assessment Findings	Compliance
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>The waste products and sources of pollution were documented in Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>In POM, 3 types of waste were identified –</p> <ul style="list-style-type: none"> <li>• Scheduled waste,</li> <li>• Domestic waste and</li> <li>• Industrial waste. These categories include: effluent, fibre/shell, EFB, decanter solid, boiler ash and etc.</li> </ul> <p>In estate, similar waste identification were sighted. Waste identification cover all types of waste generated from the different station from the estate.</p>	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<p>The disposal of used lubricants and containers were done in accordance with the SW regulations. This can be evident through verification of consignment notes for scheduled wastes i.e. #2019041911JK5GT8 (Chersonese), #20190509123P0FSM (Chersonese), #91005 (Tali Ayer). Apart from that, clinical wastes were also disposed in accordance to scheduled wastes regulations. This can be evident thorough verification of consignment notes dated 19/6/2019 from Edgenta Mediserve Sdn Bhd at Tali Ayer Estate.</p> <p>Based on the visit at SW stores, it was found that the labelling of all SW was in accordance to legal requirements, good housekeeping and containers for keeping were durable.</p> <p>Verification on inventory generated from the eSWiS, e.g. A95/130/100/006 (Chersonese Estate) and DOE’s Fifth Scheduled dated 9/7/2019, the physical quantity of the scheduled wastes was found to be consistent with the report.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>Waste management plan for 2019 was made available at all visited operating units. Based on the established plan, scheduled waste was found to be well managed with designated storage area at the mill and each estate in accordance with the legal requirements [EQA Act 1974 (SW) Reg., 2005]. Disposal of the scheduled wastes was through licensed collectors. Agrochemical containers were triple rinsed and punctured to avoid any misuse.</p> <p>If the estate is to have their own landfill, the "landfill Management in Estate" [SD/SDP/PSQM(ESH)/203-EN7, dated 13/3/2017] is to be referred to. At Holyrood Estate, signage, method (trench &amp; sandwich) can be improved according to procedure.</p>	Complied
<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.		
5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. Other effort to improve the consumption of non-renewable energy were regular maintenance of vehicles and machinery and continuously educate the operators/drivers in best practice.</p>	Complied
<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.		

Criterion / Indicator		Assessment Findings	Compliance
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhere to the policy of "Zero open burning" for any replanting in the estates. Based on visit at Block 19A & 19B (Chersonese), palms were observed to be felled, chipped and windrowed. No trace of open burning seen.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Not applicable as no fire was used in preparing land for replanting.	Complied
<b>Criterion 5.6:</b>			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment. Among the gaseous emissions sources identified were smoke from boiler operation, methane from effluent treatment plant, fertiliser consumption and emission from fossil fuel engines to name a few.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	A 5 years plan for GHG reduction [phase I, 20 mills (Malaysia)] was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan. The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain-upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.6.3 A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.                      - Minor compliance -</p>	<p>RSPO GHG calculator was used to calculate the GHG emission of the certification unit. The report had been submitted to RSPO in April 2018 for 2017 performance.                      Verification of data through inspection of various records such as store issuance records and SAP system showed that the input data was verifiable. However, based on verification of monthly records and production report for year 2018, the followings inconsistencies were observed:</p> <ol style="list-style-type: none"> <li>1) Diesel: 23,415 lt/year (vs. 24,983 lt/year in GHG Calculator)</li> <li>2) Compost applied: 14,951.59 mt/year (vs. 21,747.31 mt/year in GHG Calculator)</li> <li>3) CPO produced: 33,856.149 mt/year (vs. 33,885.85 mt/year in GHG Calculator)</li> <li>4) PK produced: 8,909.456 mt/year (vs. 8,912.54 mt/year in GHG Calculator)</li> <li>5) POME: 21,327.80 m3/year (vs. 111,503.60 mt/year in GHG Calculator)</li> <li>6) Grid electricity utilisation: 713,746 kWhr/year (vs. 1,226,183.82 kWhr/year in GHG Calculator)</li> </ol> <p>Thus, a minor NC raised.</p> <p>The mill has also conducted its emission monitoring through complying its DOE's compliance schedule (<i>Jadual Pematuhan</i>) and reports were well maintained for verification. Among the reports verified were:</p> <ul style="list-style-type: none"> <li>• Stack sampling were conducted twice a year as per Compliance Schedule requirement. Verified following reports:                             <ul style="list-style-type: none"> <li>- L-PG-AC1806CSD-0169 dated 5/7/2018, result: 0.1081 gm/Nm<sup>3</sup> for boiler #1. Boiler No. 2 was under repair during that time.</li> <li>L-PG-AC1806CSD-0169 dated 18/12/2018, result: 0.2156 gm/Nm<sup>3</sup> for boiler #1 and 0.2334 gm/Nm<sup>3</sup></li> </ul> </li> </ul>	<p>Minor nonconformance</p>

**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Chersonese POM and the supplying estates (Chersonese Estate, Kalumpong Estate and Tali Ayer Estate) have carried out Social Impact Assessment (SIA) on 14 – 17/6/2015 and 23/2 – 5/3/2015 for Holyrood Estate by Sustainability Strategy Unit, PSQM Department. The methodology of the assessment was through field interview with workers, government authorities and local communities, site observation and documentation review. Feedbacks from the stakeholders were recorded in the assessment report. Social profile such as social background of employees, background of local community, education, safety & health, living condition, stakeholder engagement and infrastructure and amenities.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Attendance list was sighted and seen the stakeholders such as government authorities, internal workers and local communities were participated in the assessment.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>Chersonese Estate has developed Management Plan on Social Impact Assessment FY 2019 based on the issues reported in social impact assessment report, stakeholder’s meetings and gender committee’s meetings. The management plan has included the key findings of housing condition/ living improvement and feedbacks from stakeholders. The plan has incorporated the action plan, status, person in charge and the completion date. Sampled of the key findings as below:</p> <ul style="list-style-type: none"> <li>a. Issue: Build a rest hut in the field especially at immature area.            Action Plan: Rest hut will be built at immature area.            Status: Rest huts were built in few areas and photo evident was sighted.</li> <li>b. Issue: Smallholder has requested the estate to repair estate road toward his farm.            Action Plan: Management will repair progressively according to budget provision.            Status: Road repair was carried out and completed on July 2019. Seen the photo evident.</li> </ul> <p>Chersonese Estate, Holyrood Estate, Kalumpong Estate and Tali Ayer Estate has developed Social Impact Assessment Plan FY 2019 which included issue, action has taken, person in charge and remark. However, the plan was not comprehensive as the plan was updated on the action taken but not the details of how to mitigate the negative impacts, promotes the positive ones and the monitoring of impacts.</p> <p>Chersonese POM has developed Social Management &amp; Action Plan for Year 2019. However, the plan only included issues and person-in-charge with time frame. No plan action of mitigation of negative impacts, promotion of the positive ones and the monitoring of the impacts in the plan.</p> <p>Thus, a major NC raised.</p>	<p>Major nonconformance</p>

Criterion / Indicator		Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Chersonese POM and the supplying estates (Chersonese Estate, Kalumpong Estate and Tali Ayer Estate) have carried out Social Impact Assessment (SIA) on 14 – 17/6/2015 and 23/2 – 5/3/2015 for Holyrood Estate by Sustainability Strategy Unit, PSQM Department. The methodology of the assessment was through field interview with workers, government authorities and local communities, site observation and documentation review. Feedbacks from the stakeholders were recorded in the assessment report. Social profile such as social background of employees, background of local community, education, safety & health, living condition, stakeholder engagement and infrastructure and amenities.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There was no scheme smallholder involved in the certification units.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Sime Darby Plantation Berhad developed Procedure for External Communication (Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/11/2008). The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.	Complied



Criterion / Indicator		Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Manager of Chersonese Estate, Holyrood Estate, Kalumpang Estate, Tali Ayer Estate and QA of Mill has been appointed as the Official Social Officer to handle all the social issues by Chief Executive Officer, Northern Region. Appointment letter dated 1/1/2019 and 12/1/2019 was sighted.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list was developed in all the supplying estates and mill. Different categories of stakeholders were identified such as contractors, suppliers, local community and government authorities. Stakeholder meeting was carried out once a year and the last meeting was carried out on 3/7/2019 in Chersonese Estate, 20/2/2019 in Holyrood Estate and 11/3/2019 in Chersonese POM with the participation of contractors, government authorities, local communities and smallholders. Issues raised by the stakeholders were recorded in the meeting minutes and incorporated into the Social Management Plan with proposed action plan. Tali Ayer Estate has organized stakeholder meeting on 20/12/2018 with participation of neighbouring factory, contractor and church's representative. Stakeholders such as local communities, government authorities and cattles' owner could not attend to the meeting. Issues were recorded in the meeting minutes and incorporated into the social impact assessment plan FY2019.	Complied
<b>Criterion 6.3:</b>			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> .	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –</p>	<p>Holyrood Estate, Kalumpong Estate and Tali Ayer Estate has implemented Grievances logbook and Chersonese POM has implemented House Defect Form, RSPO/ MSPO External and Internal Stakeholder’s Complaint Record Book to record any complaints and grievances from internal and external stakeholders. The management has taken action accordingly and sampled of the complaints as below:</p> <ul style="list-style-type: none"> <li>a. Issue: School in Holyrood has reported that the piping was leaking on 19/3/2019. Action: The management has assigned contractor to repair the broken water pipe. Seen the Invoice No.: 101 dated 8/4/2019.</li> <li>b. Issue: Plug shorting at kitchen on 9/4/2019 at House No. 11. Action: Contractor has carried out repair work for wiring and 13AMP socket outlet and seen the Invoice No.: KS-19-INV-213 dated 27/6/2019.</li> <li>c. Issue: Water pipe broken on 10/7/2019 at House No. 6A. Action: Carpenter has carried out repair work on 11/7/2019 and seen the invoice of purchase of materials with INV# 66334 dated 8/7/2019. The complainant has acknowledged on action taken.</li> </ul>	<p>Complied</p>
<p><b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP as per indicator 6.4.1.  Besides, the company has implemented Social Policy dated January 2015 where they are committed to ensure that any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, allowances, working days, deduction of salary such as Union, electricity and water bill. Payslip for October 2018, December 2018, January 2019, March 2019 and June 2019 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: 63283 (CE)</li> <li>b. Employee No.: 102037 (CE)</li> <li>c. Employee No.: 99512 (CE)</li> <li>d. Employee No.: 133579 (CE)</li> <li>e. Employee No.: 139683 (CE)</li> <li>f. Employee No.: 107656 (HE)</li> <li>g. Employee No.: 98716 (HE)</li> <li>h. Employee No.: 90790 (HE)</li> <li>i. Employee No.: 106480 (HE)</li> <li>j. Employee No.: 66746 (KE)</li> <li>k. Employee No.: 107063 (KE)</li> <li>l. Employee No.: 28991 (KE)</li> <li>m. Employee No.: 139970 (KE)</li> <li>n. Employee No.: 139589 (TAE)</li> <li>o. Employee No.: 121954 (TAE)</li> <li>p. Employee No.: 47361 (TAE)</li> <li>q. Employee No.: 144843 (TAE)</li> <li>r. Employee No.: 132397 (CPOM)</li> <li>s. Employee No.: 79268 (CPOM)</li> <li>t. Employee No.: 26733 (CPOM)</li> <li>u. Employee No.: 122299 (CPOM)</li> </ul> <p>All the sampled workers have achieved the minimum wage order. Holyrood Estate has carried out training on payslip for the calculation of wages on 3/7/2019 for harvester and 12/7/2019 for piece rated and checkroll.</p>	<p>Major nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Sampled of the payslips for December 2018 for workers (Gang 31) in Chersonese POM found that they were not paid for 7/12/2018 as the attendance was not captured in the Work Allocation Report in the system. This has been verified by the Checkroll Team Specialist in head office. Thus, a major NC raised.</p>	

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: 139683 (CE)</li> <li>b. Employee No.: 149070 (CE)</li> <li>c. Employee No.: 149124 (CE)</li> <li>d. Employee No.: 147692 (HE)</li> <li>e. Employee No.: 141056 (HE)</li> <li>f. Employee No.: 139970 (KE)</li> <li>g. Employee No.: 144210 (KE)</li> <li>h. Employee No.: 144211 (KE)</li> <li>i. Employee No.: 146463 (KE)</li> <li>j. Employee No.: 144843 (TAE)</li> <li>k. Employee No.: 139589 (TAE)</li> <li>l. Employee No.: 143920 (TAE)</li> <li>m. Employee No.: 124997 (TAE)</li> <li>n. Employee No.: 26733 (CPOM)</li> <li>o. Employee No.: 149672 (CPOM)</li> <li>p. Employee No.: 145990 (CPOM)</li> <li>q. Employee No.: 79268 (CPOM)</li> </ul> <p>Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: EMP04/INDO/2017/01) as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: 63283 (CE)</li> <li>b. Employee No.: 102037 (CE)</li> <li>c. Employee No.: 99512 (CE)</li> <li>d. Employee No.: 114397 (CE)</li> <li>e. Employee No.: 95384 (CE)</li> <li>f. Employee No.: 107656 (HE)</li> <li>g. Employee No.: 98716 (HE)</li> <li>h. Employee No.: 123841 (HE)</li> </ul>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>i. Employee No.: 90790 (HE)</li> <li>j. Employee No.: 98263 (KE)</li> <li>k. Employee No.: 107063 (KE)</li> <li>l. Employee No.: 121152 (KE)</li> <li>m. Employee No.: 121408 (KE)</li> <li>n. Employee No.: 47361 (TAE)</li> <li>o. Employee No.: 93932 (TAE)</li> <li>p. Employee No.: 121954 (TAE)</li> <li>q. Employee No.: 120866 (TAE)</li> <li>r. Employee No.: 88313 (CPOM)</li> <li>s. Employee No.: 132397 (CPOM)</li> <li>t. Employee No.: 122299 (CPOM)</li> <li>u. Employee No.: 47879 (CPOM)</li> </ul>	

<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p>	<p>All the workers were provided with basic amenities such as free accommodation, subsidized water and free medical assistance. Linesite inspection was carried out on weekly basis by Hospital Assistant/ Medical Assistant. The last inspection was carried out on 10/7/2019, 3/7/2019, 26/6/2019, 19/6/2019 and 12/6/2019 in Chersonese Estate, 8/7/2019, 1/7/2019, 24/6/2019, 17/6/2019, 10/6/2019 and 3/6/2019 in Holyrood Estate, 12/7/2019, 5/7/2019, 27/6/2019, 20/6/2019, 13/6/2019 and 4/6/2019 in Kalumpang Estate and 12/7/2019, 5/7/2019, 28/6/2019, 21/6/2019, 14/6/2019 and 7/6/2019 in Tali Ayer Estate using the Housing Complex/ Crèche/ Community Hall Inspections checklist.</p> <p>There were 9 units of single-storey terrace house (2 blocks) constructed in Holyrood Estate and seen the Certificate of Fitness dated 20/3/2019 (PCF10802/2019/0001).</p> <p>Site visit to linesite of Chersonese Estate found issues as below:</p> <ol style="list-style-type: none"> <li>a. Petrol filled in the 4 litre container without labelling</li> <li>b. Plastic bottles were found inside the dustbin at house no. 11/90.</li> </ol> <p>Site visit to linesite of Sg. Krian Division in Tali Ayer Estate found the following issues:</p> <ol style="list-style-type: none"> <li>a. Water stagnant at the drainage system with bad odour.</li> <li>b. Boots and plastic bottles found inside the dustbin.</li> <li>c. Inter-spraying pump and fertilizer pales were kept inside the house no. 31A.</li> <li>d. Ceiling with a big hole and 3 window glasses were missing at house no. 31A.</li> <li>e. Sign of spraying noted at the linesite compound.</li> </ol> <p>Linesite inspection that carried out by Hospital Assistant was found not effective as in the checklist dated 12/7/2019 shown everything were comply. However, when site visit to the linesite in Sg. Krian Division found the following inspected items were not as per the real situation.</p>	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>a. Recycle bin available in the housing complex.</li> <li>b. Free from stray dogs.</li> <li>c. No stagnant water in drainage system.</li> </ul> Thus, a minor NC raised.	
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Interviewed with the workers found that they are easily accessible to adequate, sufficient and affordable foods. Sundry shops were found inside the estates' compound and there was shops outside the nearby town. Prices of the foods were considered reasonable as informed by the workers.	Complied
<b>Criterion 6.6:</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Sime Darby has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. The policy was developed in Bahasa Malaysia and English. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpong Estate, 17/4/2019 in Tali Ayer Estate during townhall meeting and 8/4/2019 in Chersonese POM. The policy was displayed at the notice board outside the office. Interviewed with the workers confirmed that they understood on the policy and aware that they are freely to join any association.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.6.2</p> <p>Minutes of meetings with main trade unions or workers representatives shall be documented.                      - Minor compliance -</p>	<p>Union meeting was carried out once a year and the latest meeting was carried out on 26/6/2019 in Chersonese Estate. The meeting was conducted between the management and Union representatives. Issues raised by the workers were recorded in the meeting minutes and incorporated into the Social Management Plan and proposed action plan was sighted.</p> <p>There were two meetings conducted on 14/11/2018 and 23/1/2019 since last audit in Holyrood Estate. Representatives from management and workers were presented in the meeting. Issues reported were recorded in the meeting minutes. Immediate responses were given by the management during the meeting.</p> <p>Union from Tali Ayer Estate has organized meeting with the management on 15/2/2019 to discuss issue among the workers. Issues were recorded in the meeting minutes and action has been taken accordingly. Interviewed with the NUPW representative confirmed that issues have been rectified by the management.</p> <p>Chersonese POM has conducted AMESU and NUPW meeting on 13/3/2019 with total 11 participants. Seen the meeting minutes where the requests/ issues were recorded with responses in the minutes.</p>	<p>Complied</p>
<p><b>Criterion 6.7:</b>                      Children are not employed or exploited.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Sime Darby Plantation Berhad has developed Child Protection Policy and Social Policy dated January 2015 where they are committed to comply with the minimum age of employees. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpang Estate, 17/4/2019 in Tali Ayer Estate during townhall meeting and 8/4/2019 in Chersonese POM. The policy was displayed at the notice board outside the office. Document reviewed on the master listing of the employees found that all workers employed were above 18 years old. Interviewed with the workers confirmed that no child labour was found in the plantations.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpang Estate, 17/4/2019 in Tali Ayer Estate during townhall meeting and 8/4/2019 in Chersonese POM. The policy was displayed at the notice board outside the office. Interviewed with the workers confirmed that they are treated equally without any discrimination of nationality and races.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The benefits that provided to them were the same such as medical treatment, overtime was offered to everyone whenever necessary and trainings were provided according to job needs.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Sime Darby Plantation Berhad has developed Workforce Management Unit Liaison & Recruitment (LR) Procedure with Doc. No. WMU/LR-SOPP/MARCH2016, rev. 0 dated 30/3/2016. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Sime Darby Plantation Berhad has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpong Estate, 17/4/2019 in Tali Ayer Estate during townhall meeting and 8/4/2019 in Chersonese POM. The policy was displayed at the notice board outside the office.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpong Estate, 17/4/2019 in Tali Ayer Estate during townhall meeting and 8/4/2019 in Chersonese POM. The policy was displayed at the notice board outside the office. Interviewed with the female workers confirmed that they are aware of their reproductive rights.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.                      - Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed Gender Committee Handbook, First Edition and the purpose of the development of this handbook is to provide general guide to the management, Gender Committee and other relevant parties to the specific components of the Gender Policy. Gender Committee was established in every operating unit to implement, promote and disseminate values and principles of the Gender Policy. It enhances the awareness of employees on issues related to women in the workplace, gender discrimination as well as fair and equal opportunity. Flowchart to handle the social issues was stated in the handbook as well. Besides, the company has established Whistleblowing channel that could be found in <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> to enable the employees to anonymously report actual, potential, or suspected wrongdoings without fearing repercussions. Besides that, complaint form for sexual harassment was implemented to record any sexual harassment issue.</p> <p>Chersonese Estate, Kalumpang Estate and Tali Ayer Estate has established Gender Committee and meeting was carried out once every 3 months. The last meeting was carried out on 3/7/2019 with total 9 participants in Chersonese Estate, 10/6/2019 in Kalumpang Estate with total 12 participants and 14/5/2019 in Tali Ayer Estate. Issues raised by the committee were recorded in the minutes. Interviewed with the committee confirmed that no case of sexual harassment has happened.</p>	<p>Complied</p>
<p><b>Criterion 6.10:</b>                      Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
<p>6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.                      - Minor compliance -</p>	<p>No outsider FFB purchased from out-growers or smallholders as Chersonese POM only processed certified FFB from own supplying estates.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	No outsider FFB purchased from out-growers or smallholders as Chersonese POM only processed certified FFB from own supplying estates.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Sampled of contract agreement between the company and contractors as below: a. Ref. No.: FP/COR/101/941 for FFB transporter which valid from 1/6/2018 – 31/8/2019. b. Company No.: PG0306553-A for FFB transporter which valid from 1/9/2018 – 31/8/2019. c. Company No.: AS0168938-H for FFB transporter which valid from 1/9/2016 – 31/8/2019. d. Agreement No.: E162/2019/02 for rental excavator which valid from 1/1/2019 – 31/12/2019. e. Company No.: AS0168938-H for FFB transporter which valid from 1/9/2016 – 31/8/2019.  Terms and conditions of the work were clearly stated in the agreement.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Payment shall be made within 30 days after upon receipt of the invoice and confirmation of the quantity of FFB delivered under Clause 5.3. Sampled of payment records as below: a. INV# IV-00012 dated 31/3/2019; Payment made on 30/4/2019 b. INV# 1105 dated 31/3/2019; Payment made on 8/4/2019 c. INV# 1111 dated 30/4/2019; Payment made on 8/5/2019 d. INV# 1092 dated 28/2/2019; Payment made on 4/3/2019  Interviewed with the contractors confirmed the payment was made promptly.	Complied
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.			

Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Chersonese Estate has provided contribution to local communities. For eg: the school has requested the estate’s management to allow them to pass via the field in the Jin Seng Division for Merentas Desa activity. The management has responded and approved for the event. Holyrood Estate’s management also assisted the local communities such as support the temple festival Y2019, contribution to the school and appreciation letter from the school and temple’s management was sighted. Kalumpong Estate has donated to the school’s activities such as sport events upon request by the school’s management.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There was no scheme smallholders involved in the certification unit.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			

Criterion / Indicator	Assessment Findings	Compliance	
6.12.1	<p>There shall be evidence that no forms of forced or trafficked labour are used.</p> <p>- Major compliance -</p>	<p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PE 2042862 valid until 2/3/2020 (CE)</li> <li>b. Permit No.: PE 6640609 valid until 27/2/2020 (CE)</li> <li>c. Permit No.: PE 7302434 valid until 27/5/2020 (CE)</li> <li>d. Permit No.: PE 6611686 valid until 21/2/2020 (CE)</li> <li>e. Permit No.: PE 1418239 valid until 19/9/2019 (CE)</li> <li>f. Permit No.: PE 6435586 valid until 2/1/2020 (HE)</li> <li>g. Permit No.: PE 1662874 valid until 11/10/2019 (HE)</li> <li>h. Permit No.: PE 6014530 valid until 13/11/2019 (HE)</li> <li>i. Permit No.: PE 7814439 valid until 29/7/2020 (HE)</li> <li>j. Permit No.: PE 7574809 valid until 11/5/2020 (KE)</li> <li>k. Permit No.: PE 6043292 valid until 22/12/2019 (KE)</li> <li>l. Permit No.: PE 1919070 valid until 10/10/2019 (KE)</li> <li>m. Permit No.: PE 6420407 valid until 4/2/2020 (KE)</li> <li>n. Permit No.: PE 7260549 valid until 20/5/2020 (TAE)</li> <li>o. Permit No.: PE 7923288 valid until 20/7/2020 (TAE)</li> <li>p. Permit No.: PE 7923291 valid until 29/7/2020 (TAE)</li> <li>q. Permit No.: PE 6291544 valid until 30/1/2020 (TAE)</li> <li>r. Permit No.: PE 2042989 valid until 8/3/2020 (CPOM)</li> <li>s. Permit No.: PE 7100951 valid until 20/3/2020 (CPOM)</li> <li>t. Permit No.: PE 7426176 valid until 3/6/2020 (CPOM)</li> <li>u. Permit No.: PE 7267079 valid until 1/5/2020 (CPOM)</li> </ul>	<p>Complied</p>
6.12.2	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance –</p>	<p>Interviewed with the foreign workers confirmed that no contract substitution has occurred. The terms and conditions explained to them at their country of origin were similar to what they have signed in Malaysia.</p>	<p>Complied</p>



Criterion / Indicator		Assessment Findings	Compliance
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	SDPB has implemented a Sime Darby's Human Rights Charter and can be easily access via <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> where they committed as below: <ul style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Ensuring favourable working conditions</li> <li>e. Enhancing Safety and Health</li> </ul> <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p>	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Social and Humanity Management Policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. The policy has been briefed to all the workers on 27/6/2019 in Chersonese Estate, 30/6/2019 in Kalumpong Estate 17/4/2019 in Tali Ayer Estate during townhall meeting and 8/4/2019 in Chersonese POM. The policy was displayed at the notice board outside the office.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable in Peninsular Malaysia.	Not applicable
<b>Principle 7: Responsible development of new plantings</b>			

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Chersonese Palm Oil Mill</b> Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.</p>			
<p><b>Principle 8: Commitment to continual improvement in key areas of activity</b></p>			
<p><b>Criterion 8.1:</b>            Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>			
<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>Continuous Improvement Plan for Chersonese POM and supply base was established. Sighted sample of CIP established as follow:</p> <p>Chersonese Palm Oil Mill:</p> <ul style="list-style-type: none"> <li>• to improve EFB losses and increase oil recovery</li> <li>• to improve kernel extraction at kernel recovery station from 5.00% to 5.03% by end of December 2019</li> <li>• to reduce the purchase of EFB cutter</li> <li>• to sell shell 210 mt by end of Dec 2019</li> </ul> <p>Estates:</p> <ul style="list-style-type: none"> <li>• Reduce electricity consumption</li> <li>• Reduce diesel consumption</li> <li>• Upgrading of workers housing</li> </ul>	<p>Complied</p>

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**Appendix B: Approved Time Bound Plan**
**SDP- RSPO Certification Status for Malaysia Operations**

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	CU-RSPO-855718	N.A
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051,	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
					MUTU-RSPO/093	
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	N.A
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV- RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV- RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	N.A

**Legends**

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

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**SDP- RSPO Certification Status for Indonesia Operations**

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	29-Dec-21	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	31-Mar-24	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A

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17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Iilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	31-3-24	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	N.A

Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2018** for **Chersonese POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2018** for **Chersonese POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.49
PKO	0.49

Extraction	%
OER	20.46
KER	5.38

Production	t/yr
FFB Process	165,642.16
CPO Produced	33,885.85
PKO Produced	8,912.54

Land Use	Ha
OP Planted Area	12,627.95
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>12,627.95</b>

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**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	88,972.56	0.55	43.76	0.37	0	0	89,016.32	0.92
CO <sub>2</sub> Emission from fertilizer	6,876.75	0.04	4.7	0.04	0	0	6,881.45	0.08
NO <sub>2</sub> Emission	8,513.90	0.05	3.03	0.03	0	0	8,516.93	0.08
Fuel Consumption	1,347.67	0.01	0.47	0	0	0	1,348.14	0.01
Peat Oxidation	0	0	0	0	0	0	0.00	0
<b>Sink</b>								
Crop Sequestration	-85,753.10	-0.53	-43.76	-0.37	0	0	-85,796.86	-0.9
Conservation Sequestration	0	0	0	0	0	0	0.00	0
<b>Total</b>	<b>19,957.78</b>	<b>0.12</b>	<b>8.2</b>	<b>0.07</b>	<b>0</b>	<b>0</b>	<b>19,965.98</b>	<b>0.19</b>

*\*Note: Includes both estates and smallholders*



**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0	0
Fuel Consumption	77.95	0
Grid Electricity Utilisation	823.21	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>901.16</b>	<b>0.01</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	4,345.47
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

**Appendix D: General Chain of Custody Requirements for the Supply Chain**

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Chersonese mill control the receipt of its FFB from certified source only within own certification unit only. Neither uncertified FFB received from external nor certified group estates since last audit. Certificate copies for own certification unit estates supplying their FFB sighted available as with certificate # RSPO 590800.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Chersonese is not a trader or distributor. The mill license available at PalmTrace as following: - Member ID: RSPO_PO1000000302 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Membership registered under Sime Darby Plantation Berhad – SOU 2 Chersonese Palm Oil Mill RSPO Membership Number: 1-0008-04-000-00	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids were not available and not included within Chersonese scope of certification.	N/A
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The supply chain model for Chersonese Mill is Identity Preserved (IP). However declassification of segregation was made for combined certification.	Yes

5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Only one supply chain model being used i.e. IP.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System ; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018. The procedure was established which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communiation and Claim and etc.</p>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Training on Summary of New Changes in Sustainability Supply Chain and Traceability SOP: Sustainable Plantation Management System (SPMS) – Appendix 15; Plantation Sustainability and Quality Management Department date: 14/5/2018 by PSQM HQ personnel.</p>	Yes
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul>	<p>The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is Mohd. Ridhwan Ravindran (QA Supervisor); Appointed date: 1/6/2019.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p>	Yes

	ii) effectively implements and maintains the standard requirements within its organization	Latest internal audit was conducted on 19/6/2019 together with RSPO SCCS. 1 Major NC was raised by internal auditor during the audit and has been resolved by the mill.	Yes
<b>5.4. Purchasing and goods in</b>			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>The mill ensured that purchased RSPO certified FFB were in compliance and following minimum information as per following purchasing and goods in sample:</p> <ol style="list-style-type: none"> <li>1) Supplier: E148-E-Chersonese Product: 0001-FFB A Crop DO # 20789 Date delivered: 31/1/2019 Net Weight: 11,130kg FFB received (weighbridge) ticket # 179820</li> <li>2) Supplier: E121-E-Elphil* Product: 0001-FFB A Crop DO # 12335 Date delivered: 31/1/2019 Net Weight: 9,990kg FFB received (weighbridge) ticket # 178964</li> <li>3) Supplier: E150-E-Somme** Product: 0001-FFB A Crop DO # 7811 Date delivered: 12/1/2019 Net Weight: 12,770kg FFB received (weighbridge) ticket # 178889</li> <li>4) Supplier: E256-E-Kamuning* Product: 0001-FFB A Crop</li> </ol>	Yes

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		DO # 24757 Date delivered: 13/1/2019 Net Weight: 10,460kg FFB received (weighbridge) ticket # 178968	
	<ul style="list-style-type: none"> <li>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	Information complete as per sample sighted above.	Yes
	<ul style="list-style-type: none"> <li>The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	The site receiving RSPO certified oil palm products were ensured the RSPO certification states are verified based on the records of transactions sighted on site and in PalmTrace. Purchased products from group estates outside of Chersonese POM own supply bases were verified having valid RSPO certificate as per following: <ul style="list-style-type: none"> <li>- *Sime Darby Plantation Elphil Estate &amp; Kamuning Estate (Sime Darby Plantation Elphil Palm Oil Mill supply base); RSPO Certificate # RSPO 550180; Certificate licence (PalmTrace) validity: 18/7/2019 – 17/6/2020</li> <li>- **Sime Darby Plantation Somme Estate (Sime Darby Plantation Sungai Dingin Palm Oil Mill supply base); RSPO Certificate # RSPO 550179; Certificate licence (PalmTrace) validity: 12/11/2018 – 11/8/2019</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	The validity checks were ensured for all suppliers based on the records of transactions sighted on site and in PalmTrace.	Yes

	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	Chersonese Mill is not traders or distributors.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Mechanism for handling non-conforming products was based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>There's no any outsourcing activities related to processing and storage except for transport only. Specific instruction to comply with RSPO SCCS was specified in the agreements with transporter as per following sample sighted:</p> <ul style="list-style-type: none"> <li>Agreement on the Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad's Peninsular Oil Mills between Sime Darby Plantation Berhad and Mayang Bayumas Sdn. Bhd.; Date: 19/12/2017; Ref.: T/PEN/CPO/0215/001; Period (extension): 1/5/2019 – 30/4/2020</li> </ul>	Yes
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable</p>	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable

	agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.		
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> </ul>	<p>The mill ensured that supplied RSPO certified products were in compliance and following minimum information as per following sales and goods out sample:</p> <p>1) Buyer: PGEO (KCP Lumut) – PGEO Oil Mill Sdn. Bhd.            Product: 0008-Palm Kernel (PK) RSPO IP            DN # 011207            Date delivered: 18/7/2019            Net Weight: 36,750kg            Despatch ticket # 011642            Contract # S/PSD/1905/PK0343            Vehicle # KDA9771</p>	Yes

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	<ul style="list-style-type: none"> <li>Any related transport documentation;</li> <li>Supply chain certificate number of the seller;</li> <li>A unique identification number</li> </ul>	<p>2) Buyer: Kernel Crushing Plant – Pulau Carey          Product: 0008-Palm Kernel (PK) RSPO IP          DN # 011208          Date delivered: 18/7/2019          Net Weight: 37,100kg          Despatch ticket # 011643          Contract # S/C-PSD/1907/PK0539          Vehicle # AGS6398</p> <p>3) Buyer: Nuri Edible Oil (NEO) Complex          Product: 0007-Crude Palm Oil (CPO) RSPO IP          DN # 011184          Date delivered: 11/7/2019          Net Weight: 38,650kg          Despatch ticket # 011619          Contract # S/C-PSD/1907/CPO0516          Vehicle # PKF9966</p> <p>4) Buyer: Nuri Edible Oil (NEO) Complex          Product: 0007-Crude Palm Oil (CPO) RSPO IP          DN # 011186          Date delivered: 11/7/2019          Net Weight: 40,680kg          Despatch ticket # 011621          Contract # S/C-PSD/1907/CPO0519          Vehicle # PMS7767</p>	
	<ul style="list-style-type: none"> <li>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>Information complete as per sample sighted above.</p>	<p>Yes</p>



	<ul style="list-style-type: none"> <li>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>The site receiving RSPO certified oil palm products were ensured the RSPO certification states are verified based on the records of transactions sighted on site and in PalmTrace. Shipping announcement done by Global Trading &amp; Marketing (GTOM) personnel as following:</p> <ol style="list-style-type: none"> <li>En. Hanif &amp; En. Faris (CPO)</li> <li>Pn. Siti Nilah (PK)</li> </ol>	Yes
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>The registration of PalmTrace will be carried out by the GTM Department, HQ. All transaction will be registered in the PalmTrace. The mill registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> <li>Member ID: RSPO_PO1000000302</li> <li>Member category: Oil Mill</li> <li>RSPO Membership No.: 1-0008-04-000-00</li> </ul>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	<p>Shipping announcement done by Global Trading &amp; Marketing (GTOM) personnel as following:</p> <ol style="list-style-type: none"> <li>En. Hanif &amp; En. Faris (CPO)</li> <li>Pn. Siti Nilah (Kernel)</li> </ol> <p>All necessary action related to shipping announcement was described in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p>	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace</li> </ul>	<p>Every shipping announcement made with unique id for traceability and recorded accordingly.</p>	Yes

	document with a unique traceability number. Tracing can be done in a consolidated way at least annually.		
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	There were volume sold for other scheme and conventional (refer to Table 11 & 12; Supply Chain declaration of Table D & E; Summary Template).	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Samples of shipping announcement documents and found that the management done the shipping announcement accordingly.	Yes
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan established as annual Training Requirement for Operating Units (Mill) sighted for Chersonese Palm Oil Mill (FY 18/19). Training for various schemes i.e. RSPO/ISO/SCCS/LSS/HACCP/MSPO including supply chain were planned. The plan for MSPO SCCS training to be conducted on February and August 2019.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Actual training was conducted on April 2019 as per record RSPO SCCS training dated 1/4/2019; Venue: Emerald Club Bukit Selarong Estate for combined SOU 1 & SOU 2 mills was conducted for all relevant personnel involved in supply chain management. Sighted records of training conducted by PSQM department attended by mill managers, assistant mill managers, QA Supervisors, Chief Clerks and Weighbridge Clerks.	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Records were maintain accurate, complete, up-to-date and accessible during the on-site audit as of following sighted samples: <ul style="list-style-type: none"> <li>- Daily Production Summary Report for Production Date: 1/7/2019</li> <li>- Monthly Crop Report for June 2019; R06 – printed: 2/7/2019</li> </ul>	Yes

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		- Mass Balancing Records; KKS Chersonese; FYR 18/19 & FYR 19	
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Specified in IAP, for Internal Audit records minimum retention period of 10 years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for Oct 2019 – Sep 2020: CSPO: 40,499.16 mt CSPK: 10,360.25 mt	Yes
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were reported in earlier section of this report.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Yes
<b>General corporate communications</b>			

4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No "off-product" claim made by Chersonese POM in the industry public domain.	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Not applicable.	N/A
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable.	N/A
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further	Yes

		communications made by Chersonese POM for its raw products beyond its refinery and oleochemical plants buyers.	
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not applicable.	N/A
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: <ul style="list-style-type: none"> <li>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</li> <li>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</li> </ul>	Not applicable.	N/A
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.  For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.	Not applicable.	N/A
<b>Business to consumer communication</b>			

6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made Chersonese POM and only producing crude and unfinished product. Hence, business to consumer communication is not applicable for POM.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified	Not applicable.	N/A

	<p>supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b></p>			
<p><b>Certified oil palm content (IP)</b></p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified.</p>	<p>Yes</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>No SG claim made.</p>	<p>N/A</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.  Purchased products from group estates outside of Chersonese POM own supply bases were verified having valid RSPO certificate as per following:</p> <ul style="list-style-type: none"> <li>- *Sime Darby Plantation Elphil Estate &amp; Kamuning Estate (Sime Darby Plantation Elphil Palm Oil Mill supply base); RSPO Certificate # RSPO 550180; Certificate licence (PalmTrace) validity: 18/7/2019 – 17/6/2020</li> <li>- **Sime Darby Plantation Somme Estate (Sime Darby Plantation Sungai Dingin Palm Oil Mill supply base); RSPO Certificate # RSPO 550179; Certificate licence (PalmTrace) validity: 12/11/2018 – 11/8/2019</li> </ul>	<p>N/A</p>
<p><b>Labelling and trademark (IP)</b></p>			

	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ol style="list-style-type: none"> <li>a. RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ol>	<p>As to date, no RSPO trademark used by Chersonese POM.</p>	<p>N/A</p>
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>As to date, no RSPO trademark used by Chersonese POM.</p>	<p>N/A</p>
<b>5.12. Complaints</b>			



5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Addressed in Section 18 of the supply chain SOP. Should there be any complaints from stakeholders pertaining supply chain issues, it will be handled through Procedure for External Communication in PQMS SOM Sub-Section 5.5 Appendix 5.5.3.2. There has been no complaint from any third party with regards to supply chain so far.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (19: Management Review); Version 2; Issue # 5; Date: April 2019.	Yes
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	Latest management review was conducted on 28/6/2019 together with MSPO SCCS. Sighted the minutes of meeting records shown meeting agenda included all required review inputs and outputs. No any customer feedback or complaints and grievances received by the mill for products traded under other RSPO schemes since last audit. No other certified schemes trading claimed by the mill.	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	The mill manager recommended that the communication between the mill supply chain personnel and HQ's Global Trading & Marketing (GTM) to be more effective when it comes to any certified product delivery to buyer prior to despatch.	Yes

**Appendix E : CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)**

<b>D.1 Definition</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Chersonese POM received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Yes
<b>D.2 Explanation</b>			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Yes
D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).  - Member ID: RSPO_PO1000000302	Yes

		- Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00	
<b>D.3 Documented procedures</b>			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:  a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System ; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018. The procedure was established which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.	Yes
	b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.	The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is Mohd. Ridhwan Ravindran (QA Supervisor); Appointed date: 1/6/2019.	Yes
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System ; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018. The procedure was established which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.	Yes

D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	<p>The mill ensured that purchased RSPO certified FFB were in compliance and following minimum information as per following purchasing and goods in sample:</p> <ol style="list-style-type: none"> <li>1) Supplier: E148-E-Chersonese            Product: 0001-FFB A Crop            DO # 20789            Date delivered: 31/1/2019            Net Weight: 11,130kg            FFB received (weighbridge) ticket # 179820</li> <li>2) Supplier: E121-E-Elphil*            Product: 0001-FFB A Crop            DO # 12335            Date delivered: 31/1/2019            Net Weight: 9,990kg            FFB received (weighbridge) ticket # 178964</li> <li>3) Supplier: E150-E-Somme**            Product: 0001-FFB A Crop            DO # 7811            Date delivered: 12/1/2019            Net Weight: 12,770kg            FFB received (weighbridge) ticket # 178889</li> <li>4) Supplier: E256-E-Kamuning*            Product: 0001-FFB A Crop            DO # 24757            Date delivered: 13/1/2019            Net Weight: 10,460kg            FFB received (weighbridge) ticket # 178968</li> </ol>	Yes

D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There is no overproduction of certified tonnage based on the accounting system.	Yes
<b>D.5 Record keeping</b>			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.  <i>IP Mill must report on real time basis.</i>	Records were maintain accurate, complete, up-to-date and accessible during the on-site audit as of following sighted samples: <ul style="list-style-type: none"> <li>- Daily Production Summary Report for Production Date: 1/7/2019</li> <li>- Monthly Crop Report for June 2019; R06 – printed: 2/7/2019</li> <li>- Mass Balancing Records; KKS Chersonese; FYR 18/19 &amp; FYR 19</li> </ul>	Yes
<b>D.6 Processing</b>			
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	The site receiving RSPO certified oil palm products were ensured the RSPO certification states are verified based on the records of transactions sighted on site and in PalmTrace. Purchased products from group estates outside of Chersonese POM own supply bases were verified having valid RSPO certificate as per following: <ul style="list-style-type: none"> <li>- *Sime Darby Plantation Elphil Estate &amp; Kamuning Estate (Sime Darby Plantation Elphil Palm Oil Mill supply base); RSPO Certificate # RSPO 550180; Certificate licence (PalmTrace) validity: 18/7/2019 – 17/6/2020</li> <li>- **Sime Darby Plantation Somme Estate (Sime Darby Plantation Sungai Dingin Palm Oil Mill supply base); RSPO Certificate # RSPO 550179; Certificate licence (PalmTrace) validity: 12/11/2018 – 11/8/2019</li> </ul>	Yes

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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit (June 2018-June 2019)</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	June 2018	13,058.38	-	13,058.38
2	July 2018	15,353.83	-	15,353.83
3	August 2018	14,978.70	-	14,978.70
4	September 2018	15,539.85	-	15,539.85
5	October 2018	16,497.89	-	16,497.89
6	November 2018	12,997.44	-	12,997.44
7	December 2018	12,907.91	-	12,907.91
8	January 2019	13,135.19	-	13,135.19
9	February 2019	15,228.06	-	15,228.06
10	March 2019	15,389.20	-	15,389.20
11	April 2019	15,283.22	-	15,283.22
12	May 2019	15,501.13	-	15,501.13
13	June 2019	14,199.19	-	14,199.19
<b>Total</b>		190,070.10	-	190,070.10

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit (June 2018-June 2019)</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	June 2018	2,680.34	665.80
2	July 2018	3,232.24	901.25
3	August 2018	3,111.67	891.72
4	September 2018	3,201.26	856.05
5	October 2018	3,304.21	845.55
6	November 2018	2600.94	543.02
7	December 2018	2,546.40	662.97
8	January 2019	2,713.26	674.33
9	February 2019	3,209.61	827.28
10	March 2019	3,331.68	862.22
11	April 2019	3,236.17	832.40

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12	May 2019	3,247.84	778.62
13	June 2019	3,045.77	752.84
Total		39,461.39	10,093.95

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any) (June 2018-June 2019)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	P/C- PNR/1906/C PO0196	TR- 7511933c-2f6d	483.01	
2	P/C- PNR/1906/C PO0196	TR-f1c28d92-b26e	500	
3	P/C- PNR/1906/C PO0190	TR-76de7f95- 061b	500	
4	P/C- PNR/1906/C PO0189	TR-bc831d64- 8304	250	
5	P/C- PNR/1906/C PO0169A	TR-b98bdba9- 249c	250	
6	P/C- PNR/1906/C PO0095C	TR- 949c0156-64e5	234.47	
7	P/C- PNR/1905/C PO0153A	TR-a347e6fb- e669	15.53	
8	P/C- PNR/1905/C PO0153A	TR-c73e29ef- b52a	500	
9	P/C- PNR/1905/C PO0148	TR-335e51f6- 3b64	250	
10	P/C- PNR/1905/C PO0105F	TR-befd209e- 0ca7	250	
11	P/C- PNR/1905/C PO0105E	TR-02584dce- 74f4	250	
12	P/C- PNR/1905/C PO0100G	TR- 0d0079d9-7a50	250	
13	P/C- PNR/1905/C PO0100A	TR-afa65287- 104a	250	
14	P/C- PNR/1904/C PO0080D	TR-d44f54bc- a474	236.23	
15	P/C- PNR/1904/C PO0079F	TR-9eb0123a- 66f5	250	
16	P/C- PNR/1903/C PO0436	TR-10f36b78- 2e63	250	
17	P/C- PNR/1902/C PO0381	TR-a502b3dd- 3251	60	

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18	P/C- PJR/1902/C PO0379	TR- a0697a94- a536	189.95	
19	P/C- PJR/1902/C PO0379	TR-f1bdbaba- 8496	145.48	
20	P/C-PNK/1903/PK0060	TR-452b9324-be23		1,000
21	P/C-PNK/1901/PK0011A	TR-968a9cfd-baef		200
22	P/C-PNK/1810/PK0278B	TR-98dd0bb4-549f		400
23	P/C-PNK/1810/PK0278A	TR-1a3ad4ac-0d60		400
24	P/C-PNK/1809/PK0249	TR-1ad7beca-7352		500
25	P/C-PNK/1808/PK0246	TR-ca936a7f-6786		300
26	P/C-PNK/1808/PK0236	TR-262e6ebb-13d0		150
27	P/C-PNK/1808/PK0218B	TR-f96c6de2-b8d0		400
28	P/C-PNK/1808/PK0218A	TR-5b0e02de-a0f8		300
Total			7,745.04	3,650

**D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)**

No.	Buyers Name	Scheme	Name CPO Sold (mt)	PK Sold (mt)
	N/A			

**E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (June 2018-June 2019)**

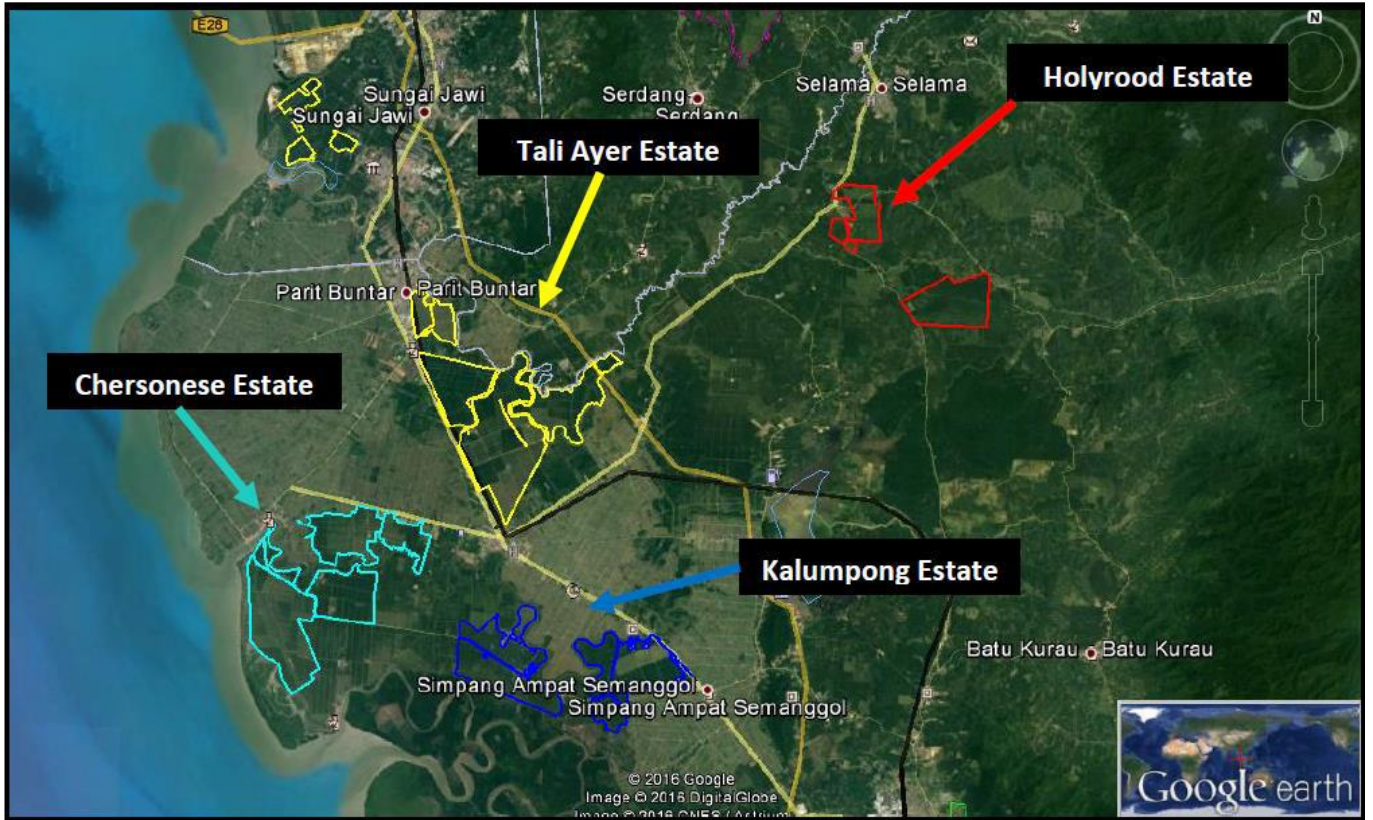
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	AAA	31,716.35	-
2	BBB	-	6,443.95
Total		31,716.35	6,443.95

**F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)**

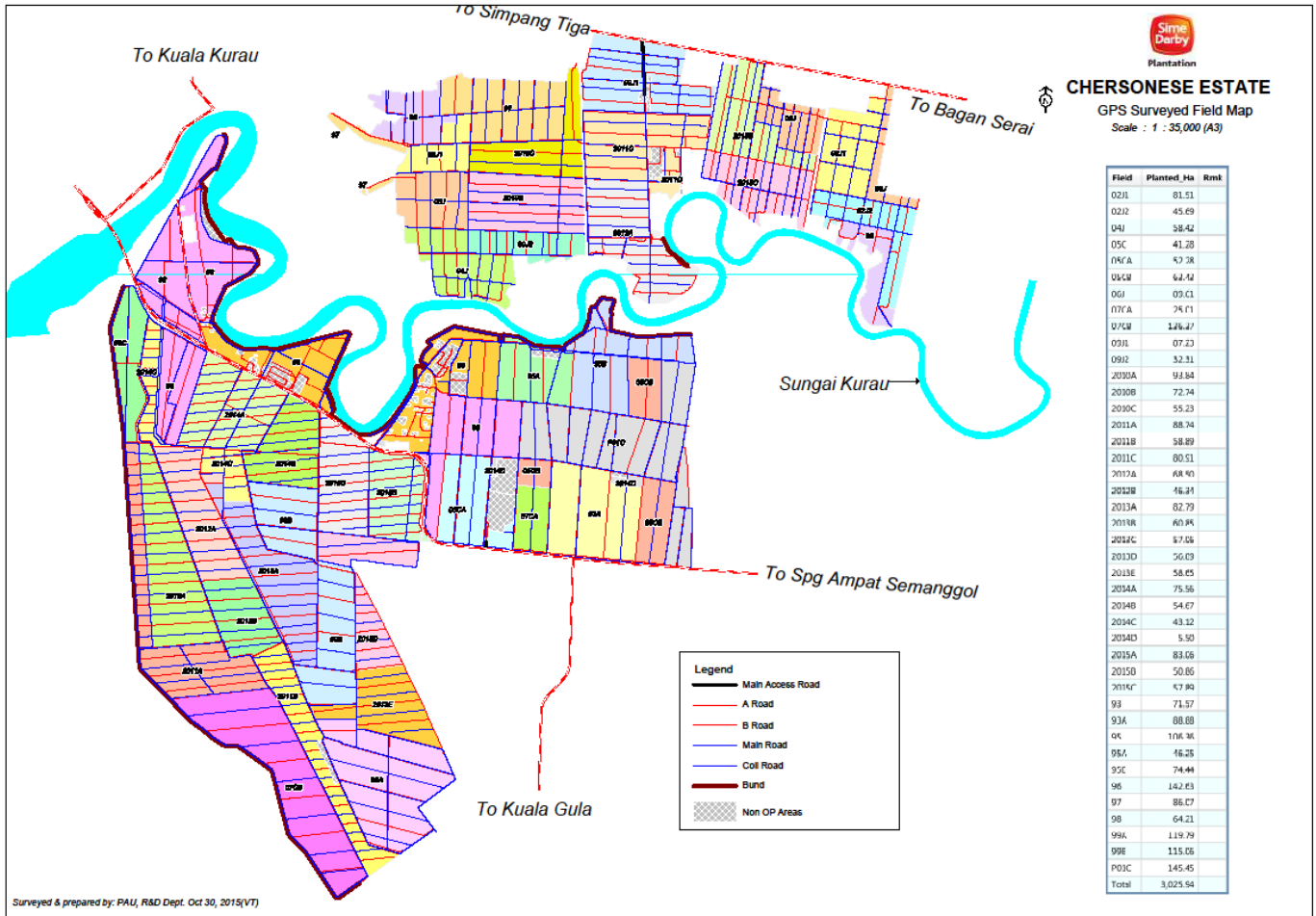
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	N/A		



**Appendix F: Location Map of Chersonese Palm Oil Mill and Supply bases**

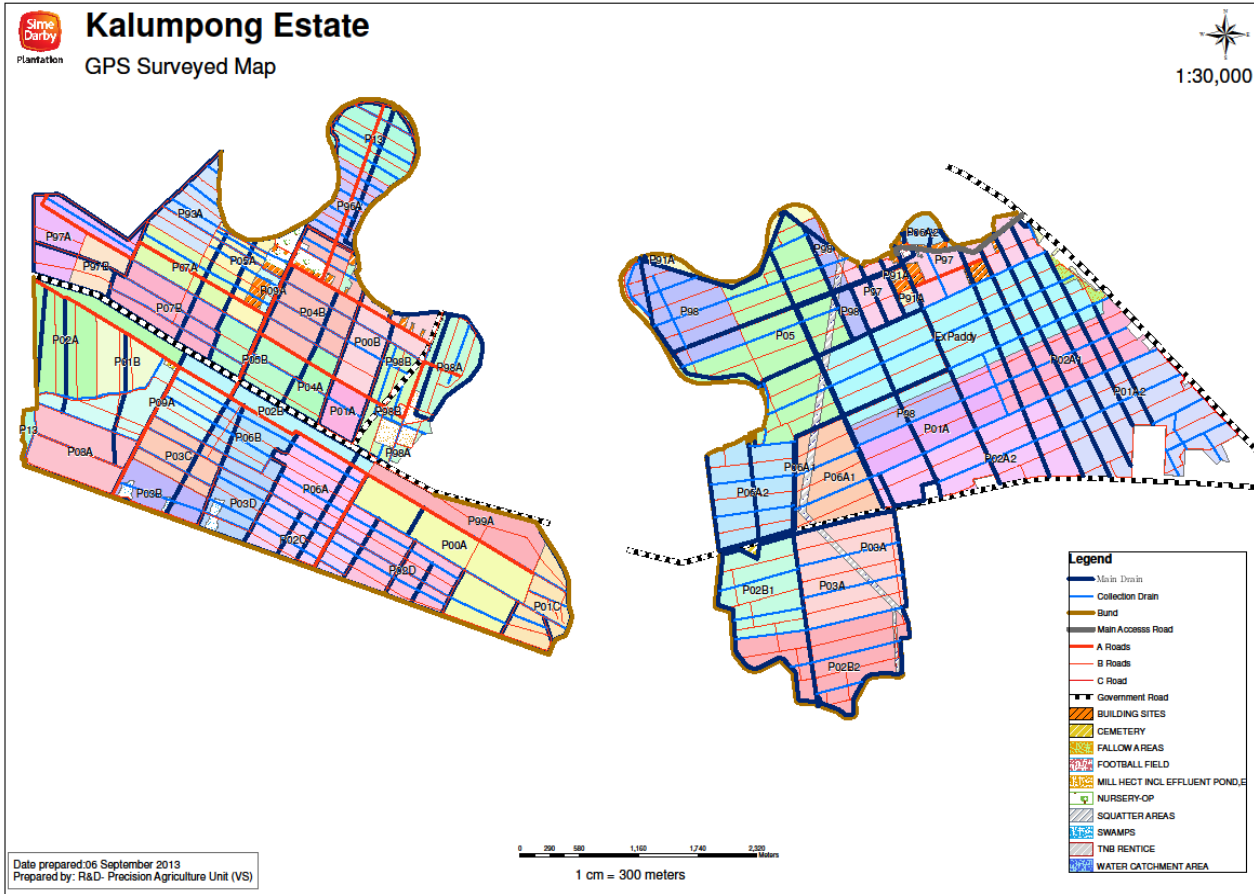


**Appendix G: Chersonese Estate Field Map**





**Appendix I: Kalumpong Estate Field Map**



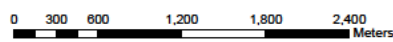
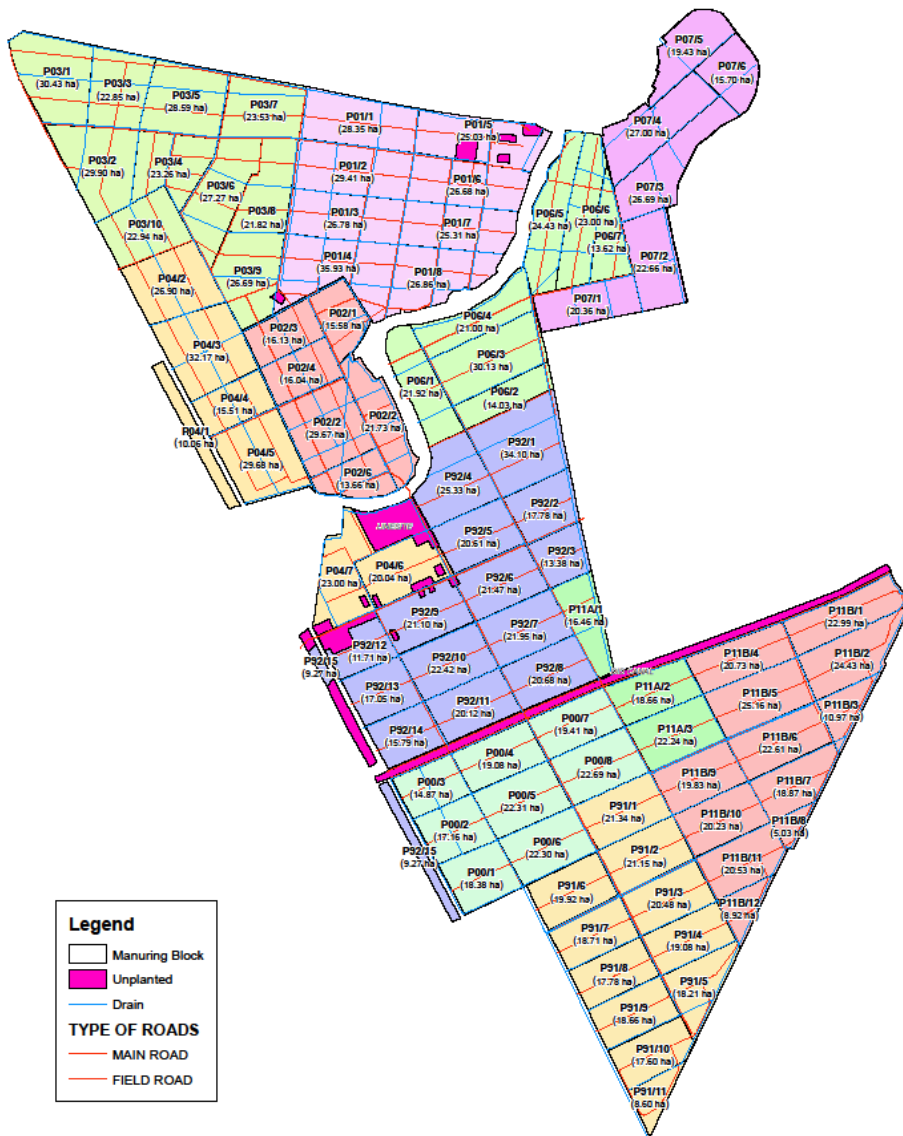
**Appendix J: Tali Ayer Estate Field Map**



**Tali Ayer Estate**  
**Tali Ayer & Sg Bogak Division**  
**Manuring Block Map**



1:27,000



Data Source : GPS Survey  
 Projection : Rectified Skew Orthomorphic (RSO)  
 Datum : Keriau 1946  
 Date Prepared: 20 February 2012  
 Prepared By: R&D - TTAS Precision Agriculture Unit (M2M2)  
 Print Scale : A3 (H 29.7 cm x W 42.0 cm)

**Appendix K: List of Smallholder Sampled (If applicable – scheme/associated/group certification)**

Not Applicable.

## Appendix L: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CE	Cherese Estate
CPOM	Cherese Palm Oil Mill
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure