

**RSPO PRINCIPLE AND CRITERIA –
 – ANNUAL SURVEILLANCE ASSESSMENT 4 (ASA4)–
 Public Summary Report**

PT. Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No.31 Jakarta 10330 Indonesia
Certification Unit: PT. Rigunas Agri Utama – Bungo Tebo Palm Oil Mill Location of Certification Unit: Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province, Indonesia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 th February 2006
Parent Company Name	PT. Inti Indosawit Subur		
Address	Jl. MH. Thamrin No.31 Jakarta 10330 Indonesia		
Subsidiary (Certification Unit Name)	PT. Rigunas Agri Utama – Bungo Tebo Palm Oil Mill		
Address	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province, Indonesia		
Contact Name	Mr. Putu Grhyate Yonata Aksa		
Website	www.asianagri.co.id	E-mail	Putu_Aksa@asianagri.com
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2. Certification Information			
Certificate Number	RSPO 620917	Date of First Certification	3 December 2015
		Certificate Start Date	3 December 2015
		Certificate Expiry Date	2 December 2020
Scope of Certification	Production of CPO and PK at Bungo Tebo Palm Oil Mill and FFB supplied from one (1) company owned estate namely Bungo Tebo Estate and eighteen (18) smallholder cooperatives. Palm oil mill capacity 60 tons FFB/hour.		
Applicable Standards	RSPO Principles and Criteria Indonesia National Interpretation September 2016; RSPO Certification System, June 2017; RSPO Supply Chain Certification Standard, June 2017 (Module E); and RSPO Supply Chain Certification System, June 2017;		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10 June 2020
EU-ISCC-Cert-DE100-27302019	ISCC	SGS	28 June 2020
BSI-ISPO 619412	ISPO	BSI Group Indonesia	5 December 2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates (Note for Auditors: Deg °, Minutes ', Seconds " ; The format must be two decimal points) (Eg. 3° 51' 14.01" N)	
		Latitude	Longitude
Bungo Tebo Palm Oil Mill	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province.	1° 20' 46.02" S	102°27'17.04" E
Bungo Tebo Estate	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province	01° 15' 13" S - 01° 21' 51" S	102° 21' 39" E - 102° 29' 08" E
Koperasi Tanjung Dani Sakti	Tanjung Dani Hamlet, Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 17" S	102° 24' 36" E
Koperasi Sumay Jaya	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 23' 02" S	102° 26' 13" E
Koperasi Sumber Usaha	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 23' 06" S	102° 26' 49" E
Koperasi Sawit Bina Tani	Sungai Rambai Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 22' 31"S	102° 23' 54" E
Koperasi Belarik Jaya	Jati Belarik Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 27' 36" S	102° 27' 06" E
Koperasi Sawit Tambara Jaya	Tambun Arang Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 26' 16" S	102° 28' 02" E
Koperasi Tunas Harapan	Teluk Langkap Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 26' 02" S	102° 26' 18" E
Koperasi Sejahtera Tani	Punti Kalo Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 25' 29" S	102° 25' 31" E
Koperasi Produksi Tani Mandiri	Kandang Village, Tebo Tengah sub-District, Tebo Regency, Jambi Province	01° 26' 34" S	102° 29' 24" E
Koperasi Tanjung Jaya Bersama	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 40" S	102° 28' 29" E
Koperasi Tanjung Aur Duri	Teriti Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 38" S	102° 28' 03" E
Koperasi Sawit Sumay Makmur	Pinang Belai Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 16' 58" S	102° 21' 50" E
Koperasi Sawit Makmur	Sekutur Jaya Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 15' 34" S	102° 20' 01" E
Koperasi Barokah	Teluk Kasai Rambahan Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 18' 00" S	102° 18' 40" E

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Koperasi Sawit Keluarga Sejahtera	Bungo Tanjung Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 12' 46.8" S	102° 18' 57.7" E
Koperasi Sawit Makmur Bersama	Bukit Pamuan Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 12' 15.5" S	102° 18' 33.8" E
Koperasi Sawit Karya Makmur	Napal Putih Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 11' 02.4" S	102° 17' 01.3" E
Koperasi Sawit Tanduk Perkasa	Suko Makmur Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 09' 05.0" S	102° 13' 55.5" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature)* (ha)	HCV (ha)	Infrastructure & Other** (ha)	Total Area (ha)	% of Planted
Bungo Tebo Estate	2,519.38	37	109.26	2,665.64	94.51
Bungo Tebo Smallholder Scheme (2,957 smallholder's)	5,914	0	0	5,914	100
Koperasi Tanjung Dani Sakti (110 smallholder's)	220		0	220	100
Koperasi Sumay Jaya (116 smallholder's)	232		0	232	100
Koperasi Sumber Usaha (92 smallholder's)	184		0	184	100
Koperasi Sawit Bina Tani (119 smallholder's)	238		0	238	100
Koperasi Belarik Jaya (91 smallholder's)	182		0	182	100
Koperasi Sawit Tambara Jaya (109 smallholder's)	218		0	218	100
Koperasi Tunas Harapan (72 smallholder's)	144		0	144	100
Koperasi Sejahtera Tani (44 smallholder's)	88		0	88	100
Koperasi Produksi Tani Mandiri (79 smallholder's)	158		0	158	100
Koperasi Tanjung Jaya Bersama	68		0	68	100

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(34 smallholder's)					
Koperasi Tanjung Aur Duri (34 smallholder's)	68		0	68	100
Koperasi Sawit Sumay Makmur (429 smallholder's)	858		0	858	100
Koperasi Sawit Makmur (336 smallholder's)	672		0	672	100
Koperasi Barokah (186 smallholder's)	372		0	372	100
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)	136		0	136	100
Koperasi Sawit Makmur Bersama (314 smallholder's)	628		0	628	100
Koperasi Sawit Karya Makmur (355 smallholder's)	710		0	710	100
Koperasi Sawit Tanduk Perkasa (369 smallholder's)	738		0	738	100
Grand Total	8,433.38	37	109.26	8,579.64	98.29

*: planted area are includes Mature, Immature and Replanting

** : infrastructure & others consist of Mill (24.18 Ha), Road & Bridges (45 Ha), Nursery (11.08 Ha), boundary trenches (12 Ha), workers housing (17 Ha). Data collected based on Area Statement August 2018.

HCV area of Bungo Tebo Estate is within the HGU (3,367.28 Ha), whilst HCV for smallholders is outside the certificate of land ownership (SHM). Therefore, no HCV identified within the smallholder certified area.

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bungo Tebo Estate	1,191.38	512.00	0	816.00	0	1,328.00	1,191.38
Bungo Tebo Smallholder Scheme (2,957 smallholder's)	0	0	866.00	5,048.00	0	5,914.00	0
Koperasi Tanjung Dani Sakti (110 smallholder's)	-	-	-	220	-	220	-

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Koperasi Sumay Jaya (116 smallholder's)	-	-	-	232	-	232	-
Koperasi Sumber Usaha (92 smallholder's)	-	-	134	50	-	184	-
Koperasi Sawit Bina Tani (119 smallholder's)	-	-	112	126	-	238	-
Koperasi Belarik Jaya (91 smallholder's)	-	-	64	118	-	182	-
Koperasi Sawit Tambara Jaya (109 smallholder's)	-	-	26	192	-	218	-
Koperasi Tunas Harapan (72 smallholder's)	-	-	12	132	-	144	-
Koperasi Sejahtera Tani (44 smallholder's)	-	-	28	60	-	88	-
Koperasi Produksi Tani Mandiri (79 smallholder's)	-	-	158	-	-	158	-
Koperasi Tanjung Jaya Bersama (34 smallholder's)	-	-	68	-	-	68	-
Koperasi Tanjung Aur Duri (34 smallholder's)	-	-	42	26	-	68	-
Koperasi Sawit Sumay Makmur (429 smallholder's)	-	-	-	858	-	858	-
Koperasi Sawit Makmur (336 smallholder's)	-	-	-	672	-	672	-
Koperasi Barokah (186 smallholder's)	-	-	-	372	-	372	-
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)	-	-	-	136	-	136	-
Koperasi Sawit Makmur Bersama (314 smallholder's)	-	-	-	628	-	628	-
Koperasi Sawit Karya Makmur (355 smallholder's)	-	-	-	710	-	710	-

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Koperasi Sawit Tanduk Perkasa (369 smallholder's)	-	-	222	516	-	738	-
Grand Total (Ha)	1,191.38	512.00	866.00	5,864.00	0	7,242.00	1,191.38
Note: Immature area include replanting area.							

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Dec 2018 – Nov 2019)	Actual (Sept 2018 – Sept 2019)	Forecast (Dec 2019 – Nov 2020)
Bungo Tebo Estate	26,145.40	29,667.33	21,759.00
Bungo Tebo Smallholder Scheme (2,957 smallholder's)	112,970.08	95,802.99	107,350.00
Koperasi Tanjung Dani Sakti (110 smallholder's)	3,502.57	2,613.08	3,881.00
Koperasi Sumay Jaya (116 smallholder's)	3,699.90	2,205.58	4,092.00
Koperasi Sumber Usaha (92 smallholder's)	2,840.40	2,360.77	2,911.00
Koperasi Sawit Bina Tani (119 smallholder's)	3,254.61	1,581.75	3,739.00
Koperasi Belarik Jaya (91 smallholder's)	3,427.48	2,448.42	3,104.00
Koperasi Sawit Tambara Jaya (109 smallholder's)	4,405.62	3,848.71	3,373.00
Koperasi Tunas Harapan (72 smallholder's)	3,270.89	3,367.29	2,283.00
Koperasi Sejahtera Tani (44 smallholder's)	1,796.58	1,649.78	1,508.00
Koperasi Produksi Tani Mandiri (79 smallholder's)	3,232.29	4,166.68	3,127.00
Koperasi Tanjung Jaya Bersama (34 smallholder's)	987.96	843.64	1,417.00

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Koperasi Tanjung Aur Duri (34 smallholder's)	1,145.65	501.30	616.00
Koperasi Sawit Sumay Makmur (429 smallholder's)	17,379.68	16,363.19	15,134.00
Koperasi Sawit Makmur (336 smallholder's)	12,785.44	9,360.75	13,573.00
Koperasi Barokah (186 smallholder's)	7,042.09	5,331.50	6,356.00
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)	2,485.82	1,990.29	2,683.00
Koperasi Sawit Makmur Bersama (314 smallholder's)	12,574.99	13,504.95	12,872.00
Koperasi Sawit Karya Makmur (355 smallholder's)	13,546.46	11,069.13	13,894.00
Koperasi Sawit Tanduk Perkasa (369 smallholder's)	15,591.63	12,596.25	12,787.00
Grand Total	139,115.48	125,470.39	129,109.00

Note: *Estimated and Forecast are the 12 months from the licence period.
Actual are period from the last previous audit.*

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Dec 2018 – Nov 2019)	Actual (Sept 2018 – Sept 2019)	Forecast (Dec 2019 – Nov 2020)
Nil	N/A		N/A
Total			

Note: *There is no FFB received from another certified unit.*

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Dec 2018 – Nov 2019)	Actual (Sept 2018 – Sept 2019)	Forecast (Dec 2019 – Nov 2020)
3 rd Party FFB	153,338.95	126,008.93	153,650.00

10. Certified Tonnage			
Mill Capacity: 60 MT/hr SCC Model: MB	Estimated (Dec 2018 – Nov 2019)	Actual (Sept 2018 – Sept 2019)	Forecast (Des 2019 – Nov 2020)
	FFB	FFB	FFB
	139,116.00	125,470.39	129,109.00
	CPO (OER: 20.94 %)	CPO (OER: 21.18%)	CPO (OER: 21.29%)
	29,131.00	26,573.00	27,483.00
	PK (KER: 5.45 %)	PK (KER: 5.55%)	PK (KER: 5.50 %)
7,582.00	6,957.77	7,101.00	

Note: Estimated and Forecast are the 12 months from the licence period.
Actual are the period from the last previous audit.

11. Actual Sold Volume (CPO) (Sept 2018 – Sept 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	0	23,445.55	0	0	23,445.55

12. Actual Sold Volume (PK) (Sept 2018 – Sept 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	4,312.09	0	0	0	4,312.09

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	N/A	N/A
IS-CSPKO		
IS-CSPKE		

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 surveillance assessment was conducted from 17 – 25 October 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 13 November 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, Indonesia National Interpretation 2016 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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bungo Tebo POM	X	X	X	X	X
Bungo Tebo Estate	X	X	X	X	X
Koperasi Tanjung Dani Sakti (110 smallholder's)			X		
Koperasi Sumay Jaya (116 smallholder's)		X			
Koperasi Sumber Usaha (92 smallholder's)		X			
Koperasi Sawit Bina Tani (119 smallholder's)			X		
Koperasi Belarik Jaya (91 smallholder's)			X		
Koperasi Sawit Tambara Jaya (109 smallholder's)			X		
Koperasi Tunas Harapan (72 smallholder's)				X	

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Koperasi Sejahtera Tani (44 smallholder's)				X	
Koperasi Produksi Tani Mandiri (79 smallholder's)				X	
Koperasi Tanjung Jaya Bersama (34 smallholder's)				X	
Koperasi Tanjung Aur Duri (34 smallholder's)		X			
Koperasi Sawit Sumay Makmur (429 smallholder's)					X
Koperasi Sawit Makmur (336 smallholder's)		X			
Koperasi Barokah (186 smallholder's)					X
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)					X
Koperasi Sawit Makmur Bersama (314 smallholder's)					X
Koperasi Sawit Karya Makmur (355 smallholder's)				X	
Koperasi Sawit Tanduk Perkasa (369 smallholder's)					X

Tentative Date of Next Visit: October 1, 2020 - October 8, 2020

Total No. of Mandays: 30 Mandays

2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
Mujinius Jalaraya	Lead Assessor	He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He have a working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014. He involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001: 2008 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001: 2004 Training, Training for Trainers, OHS Expert Training, etc. He is fluently speaking in English and Bahasa Indonesia. During this assessment, he assessed on the aspects of Legal, Environmental management and monitoring, OHS management and HCV management and monitoring.
Eko Purwanto (EP)	Team Member	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has experience in auditing ISO 9001, ISPO, RSPO P&C and RSPO SCC with SAI Global since 2012 to 2017 as Lead Auditor and sometimes as Auditor. He joined BSI Group Indonesia in August 2017 as Auditor/Lead Auditor for ISO, ISPO, RSPO P&C and RSPO SCC (Client Manager/Tutor). He has been trained for lead auditor of RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012) and RSPO SCC (2012). He has received refreshment training of RSPO P&C in May 2018 and RSPO SCC in March 2018. He has also completed training course of ISO 14001 (2012), Minaut (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery. During this assessment, he assessed on the aspects of Agronomy Best Management Practise, organisation management plan and continual improvement.
Edi Widodo (EW)	Team Member	Edy Widodo graduated as bachelor of the Faculty of Agriculture, Department of Agricultural Technology, University of Padjadjaran, Bandung. Earlier he worked as an Assistant Estates Manager in PT SMART Tbk. (1999 to 2005). He is the Lead Auditor for ISO 9001: 2008. He has working experience in the industrial sector and audit Plantation and also the processing industry and agricultural mechanization. He also the ISPO auditor who has obtained a certificate from the ISPO Commission, Ministry of Agriculture of Indonesia, on February 2013. He had got a certificate of training on Understanding ISO 14001: 2004 & Auditing ISO 14001: 2004 in 2013. He also had joined RSPO P&C training (2013) and also Course RSPO Lead Auditor 2016 - RSPO

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		Endorsed RSPO Supply Chain Certification Training Course on April 2016. During this assessment, he assessed on the aspects of transparency, social, labor and stakeholder consultation
Imam Fakhrurozi (IM)	Team Member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta in 2011. He had 2 (two) years working experienced related to oil palm industries i.e. as a sustainability and HSE in oil palm Plantation Company in Indonesia. Several relevant Training he has completed include ISO 9001 and 14001 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed courses. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2016. During this assessment, he assessed on the OHS and environment aspect.
Pratama Agung Sedayu (PS)	Team Member	He graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of Legal, Social and Labour and Smallholder audits. He is fluently speaking in English and Bahasa Indonesia.
Yudwi Wisnu Rahmanto (YW)	Team Member	Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During the assessment he assigned to assessed on the OHS and environment aspect.

Accompanying Persons: Nil

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2.3 Assessment Plan

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

RSPO Annual Surveillance 4 (ASA_4) Assessment Plan PT Rigunas Agri Utama – Bungo Tebo POM & Its Supply Bases.

Date	Time	Subjects	MJ	EW	IF	EP	PS	YWR
Thursday, 17/10/2019	08.00 – 09.00	Opening meeting <ul style="list-style-type: none"> • Presentation by client (Overview of PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill and its supply base); • Presentation by BSI team (Objective, scope, audit plan, etc.) 	√	√	√			
	09.00 – 12.00	Field observation to Bungo Tebo Estate : <ul style="list-style-type: none"> • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect (Land Ownership, Legal Boundaries, Land Occupied) • Observation of Workers Facilities (Housing complex, School, Worship Place, etc.). • Consultation with internal stakeholders (labor union and gender committee) and local contractor for Estate. 	√	√	√			
	10.00 – 12.00	Interview with Stakeholders (statutory bodies): <ul style="list-style-type: none"> - Environmental Agency of Batang Hari Regency - Labour Agency (Disnakertrans) of Batang Hari Regency - National Land Agency (Kantor Pertanahan) of Batang Hari Regency - Plantation Agency (Disbun) of Batang Hari Regency - NGO 		√				
	12.00 – 14.00	Break	√	√	√			
	14.00 – 17.00	Document Review Bungo Tebo Estate : <ul style="list-style-type: none"> • Verification of Basic Information Estate • General information, Time bound plan, partial certification verification • Best management practices Estate, OHS, EMS, Social and Labour, RSPO Supply Chain, Continual improvement, etc. • Review of previous assessment findings. 	√	√	√			
Friday, 18/10/2019	08.00 – 10.00	Field observation to Bungo Tebo POM : <ul style="list-style-type: none"> • Implementation of Mill Processing Aspect & Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO, Data Record) 	√	√	√			

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Date	Time	Subjects	MJ	EW	IF	EP	PS	YWR
		<ul style="list-style-type: none"> Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities) Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – <i>if any</i>) Consultation with internal stakeholders (labor union and gender committee) and local contractor for Mill. 						
	10.00 – 12.00	Interview with Stakeholder: <ul style="list-style-type: none"> Village Head/Community leader Local community Labor union, Committee Gender 		√				
	10.00 – 12.00	Document Review Bungo Tebo POM: <ul style="list-style-type: none"> Verification of Basic Information Mill. General information. Best management practices Mill, OHS, EMS, Social and Labour, RSPO Supply Chain, Continual improvement, etc. Review of previous assessment findings. RSPO Supply Chain for CPO Mill. 	√	√	√			
	12.00 – 14.00	Break	√	√	√			
	14.00 – 17.00	Document Review Bungo Tebo POM: <ul style="list-style-type: none"> Verification of Basic Information Mill. General information. Best management practices Mill, OHS, EMS, Social and Labour, RSPO Supply Chain, Continual improvement, etc. Review of previous assessment findings. RSPO Supply Chain for CPO Mill. 	√	√	√			
Saturday, 19/10/2019	08.00 – 12.00	Field observation to Koperasi Sawit Keluarga Sejahtera (scheme Smallholders): <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) Sample taken: 4 smallholders plot		√	√			
	08.00 – 12.00	RSPO Supply Chain for CPO Mill	√					

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Date	Time	Subjects	MJ	EW	IF	EP	PS	YWR
	12.00 – 14.00	Break	√	√	√			
	12.00 – 16.00	Audit Continue for RSPO Supply Chain	√					
	12.00 – 16.00	Document Review for Smallholder: Koperasi Sawit Keluarga Sejahtera		√	√			
Sunday, 20/10/2019		Stay at Mess Bungo Tebo	√	√	√			
	14.45 – 16.00	Flight Jakarta – Muara Bungo				√	√	√
Monday, 21/10/2019	08.00 – 12.00	Field observation to Koperasi Sawit Makmur Bersama (scheme Smallholders) : <ul style="list-style-type: none"> • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect (Land Ownership, Legal Boundaries) • Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) Sample taken: 14 smallholders plot	√	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√	√
	14.00 – 17.00	Field observation to Koperasi Barokah (scheme Smallholders) : <ul style="list-style-type: none"> • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect (Land Ownership, Legal Boundaries) • Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) Sample taken: 8 smallholders plot	√	√	√	√	√	√
Tuesday, 22/10/2019	08.00 – 12.00	Field observation to Koperasi Sawit Sumay Makmur (scheme Smallholders) : <ul style="list-style-type: none"> • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road 	√	√	√	√	√	√

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Date	Time	Subjects	MJ	EW	IF	EP	PS	YWR
		Maintenance, Biological Control Monitoring, EFB Application <ul style="list-style-type: none"> Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) Sample taken: 20 smallholders plot						
	12.00 – 14.00	Break	√	√	√	√	√	√
	14.00 – 17.00	Field observation to Koperasi Sawit Tanduk Perkasa (scheme Smallholders): <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) Sample taken: 16 smallholders plot	√	√	√	√	√	
Wednesday, 23/10/2019	08.00 – 12.00	Review Document of Scheme Smallholder: Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Sumay Makmur, Koperasi Sawit Tanduk Perkasa	√	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√	√
	14.00 – 17.00	Continue Review Document of Scheme Smallholder: Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Sumay Makmur, Koperasi Sawit Tanduk Perkasa		√	√	√	√	√
Thursday, 24/10/2019	08.00 – 12.00	Review Document of Scheme Smallholder: Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Sumay Makmur, Koperasi Sawit Tanduk Perkasa		√	√	√	√	√
	12.00 – 14.00	Break		√	√	√	√	√
	14.00 – 17.00	Continue Review Document of Scheme Smallholder: Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Sumay Makmur, Koperasi Sawit Tanduk Perkasa		√	√	√	√	√

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Date	Time	Subjects	MJ	EW	IF	EP	PS	YWR
Friday, 25/10/2019	08.00 – 09.00	Report Preparation	√	√	√	√	√	√
	09.00 – 11.00	Closing Meeting	√	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√	√
	13.00 – 15.00	Travel to Muara Bungo	√	√	√	√	√	√
	16.50 – 18.00	Flight Muara Bungo - Jakarta	√	√	√	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- PT Inti Indosawit Subur Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C INA-NIWG 2016

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?	PT. Rigunas Agri Utama – Bungo Tebo POM as a subsidiary of PT Inti Indosawit and Asian Agri Group has explained the certification plan for all of its subsidiaries; indicating all palm oil mills and company-owned estates, including smallholder as the supply base.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	<p>The time bound plan is challenging. PT. Inti Indosawit Subur – Asian Agri Group demonstrate progress overtime.</p> <p>The age of plantation was generally mature. All of plantation has been incorporated with palm oil mill to process the FFB produced.</p> <p>The location of plantations were covering three provinces in Sumatera Utara Province, Riau Province and Jambi Province – Indonesia.</p> <p>However there are still one management unit which has not been certified namely PT Mitra Ungul Pusaka – Segati Palm Oil Mill. Segati Palm Oil Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2020. Status of disclosure PT MUP has been submitted to RSPO by email since 29 November 2017. LUCA supporting data for PT Mitra Unggul Pusaka has been sent again by company to RSPO on 2 April 2019 including HGU 1 : Gondai Estate & Penarikan Estate (Integrated Report for Both Estate, for Annex 3a has use the new template); HGU 2 : Segati Estate (Integrated Report & Annex 3a). Citra Landsat Map (Stripping View) with sourcing date information to give clear analysis still in progress to complete. Until audit</p>	Comply

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	performed the NPP process and LUCA status are under review by RSPO.	
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.	There is no any new acquisitions.	Comply
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?	There is a changing of Time Bound Plan on July 2019. Previous plan the unit expected to certify all their unit in 2019, however there are still one management unit which has not been certified namely PT Mitra Ungul Pusaka – Segati Palm Oil Mill because of NPP and RaCP still in progress. Liability disclosure and NPP PT Mitra Ungul Pusaka has been submitted to RSPO by email since 29 November 2017, the review has progress and LUCA supporting data for PT Mitra Unggul Pusaka has been sent again by company to RSPO on 2 April 2019. Until audit performed the NPP process and LUCA status are under review by RSPO. The justification of changing has been provide by company. ACOP reporting submission has been done since May 2019, so that the update of time bound plan will be include in the ACOP 2019.	Comply
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no any isolated lapses in implementation of the plan. Company managed to demonstrate commitment to certify all of palm oil mill and supply base.	Comply
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 Major non-compliance shall be raised	There is no fundamental failure to proceed with implementation of the plan.	Comply
Have there been any stakeholder comments?	There is no stakeholder comments regarding the certification and no negative comment raised to the company.	Comply
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	There is no replacement of primary forest and HCV area according to LUCA report. PT Mitra Unggul Pusaka – Segati Palm Oil Mill has proposing the LUCA review to RSPO. New planting was performed through conversion from rubber plantation. Company has prepare for NPP submission to RSPO. NPP for conversion area is still in progress.	Comply

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Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	In area where BSI conducted audit, there are no replacement/conversion of primary forest after November 2005.	Comply
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&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	There is new planting after January 1 st , 2010. New planting was performed through conversion from rubber plantation. Company has prepare for NPP submission to RSPO. NPP for conversion area is still in progress including supporting documents (conversion permit, HCV assessment, etc). LUCA supporting data for PT Mitra Unggul Pusaka has been sent by company to RSPO on 2 April 2019 including HGU 1 : Gondai Estate & Penarikan Estate (Integrated Report for Both Estate, for Annex 3a has use the new template); HGU 2 : Segati Estate (Integrated Report & Annex 3a). Citra Landsat Map (Stripping View) with sourcing date information to give clear analysis still in progress to complete. Until audit performed the NPP process and LUCA status are under review by RSPO.	in progress
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute noted. This was based on stakeholder interview with worker union in each company. In addition, audit team found the same based on stakeholder interview with "Dinas Tenaga Kerja" on each regency audited.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non compliance was noted. Company maintain the legal compliance through regular evaluation and internal audit.	Comply
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. PT. Mitra Unggul Pusaka – Segati POM conducted internal audit annually. Last audit performed in 2019 as follow: Segati Mill : 25 – 26 March 2019 Segati Estate : 25 – 26 March 2019 Penarikan Estate: 27 – 29 March 2019 Gondai Estate : 27 – 29 March 2019	Comply

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
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	Smallholder as a supply base of PT Inti Indosawit Subur (Asian Agri Group) as a parent company of PT Gunung Melayu has been certified comply with the standard within three years of the mill's initial certification as bellow:	Comply

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<p>after two years, and a major NC if this requirement is not met after three years.</p>	<ul style="list-style-type: none"> - Buatan Plasma Certified on 13th March 2012 as supply base of Buatan I & II Mill which Certified on 16th September 2010. - Buatan KKPA Certified on 17th January 2013 as supply base of Buatan I & II Mill which Certified on 16th September 2010. - Ukui Plasma Certified on 11th June 2012 as supply base of Ukui I & II Mill which Certified on 1st March 2011. - Tungkal Ulu Plasma Certified on 11th July 2013 as supply base of Tungkal Ulu Mill which Certified on 15th August 2012. - Muara Bulian Plasma & KKPA Certified on 12th July 2013 as supply base of Muara Bulian Mill which Certified on 28th August 2012. - Bungo Tebo Plasma Certified on 7th February 2017 as supply base of Bungo Tebo Mill which Certified on 3rd December 2015. 	
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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 Annual Surveillance Assessment 4 (ASA_4) there were 5 Major and 1 minor nonconformities raised. PT Rigunas Agri Utama – Bungo Tebo POM 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 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 on 13 November 2019.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1839713-201910-M1	Clause & Category (Major / Minor)	RSPO P&C INA NI, September 2016 - Indicator 2.2.2 minor Escalated to Major
Date Issued	25 October 2019	Due Date	22 January 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 November 2019
Statement of Nonconformity:	Legal boundary pegs in sample of smallholders plot are not found.		

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Requirement Reference:	Legal boundaries are demonstrated clearly and maintained.
Objective Evidence:	<p>During field visit at smallholder kavling, it was found:</p> <ul style="list-style-type: none"> - Kavling 1369 KUD Sawit Tanduk Perkasa: 1 boundary pegs were not available. There is no follow up action. - Kavling 1362 KUD Sawit Tanduk Perkasa: 1 boundary pegs were not available. According to monitoring result on 31/07/2019 1 boundary pegs were not available. There is no follow up action. - Kavling 407 KUD Sumay Makmur: 1 boundary pegs were not available. Monitoring result on 07/01/2019 were not follow up. - Kavling 475 KUD Barokah: 1 boundary pegs were not available.
Corrections:	<ul style="list-style-type: none"> • Installing smallholders plot missing pegs at Kavling 1362 and 1369 KUD Sawit Tanduk Perkasa, Kavling 407 KUD Sumay Makmur and Kavling 475 KUD Barokah. • Plasma Bungo Tebo has taken action to install the boundary pegs at Kavling 407 KUD Sawit Sumay Makmur, Kavling 475 KUD Barokah, Kavling 1362 and 1369 KUD Sawit Tanduk Perkasa at 28 October 2019. Evidence of boundary pegs installation are available as per "Berita Acara Pemasangan Patok Batas di Kavling Petani". • Plasma Bungo Tebo also has taken follow up action by conducting socialization and awareness regarding the benefit of boundary markers (pegs) installation in their kavling. Boundary markers function are: to determined the size area of kavling ownership, to assist the boundary of harvesting area, weeds control, fertilizer application and pruning. Socialization conductd on 29 October 2019 at KUD Office KUD Sawit Tanduk Perkasa Desa Sako Makmur. Socialization participant are from KUD Sawit Tanduk Perkasa, KUD Sumay Makmur and KUD Barokah, attend by 48 participant including official of KUD. Evidence of awareness and socialization are available such as attendant list, minutes of socialization and photo documentation. • Plasma Bungo Tebo also install the banner/baliho as media for socialization in KUD Barokah, KUD Sawit Tanduk Perkasa, KUD Sawit Sumay makmur, KUD Sawit Keluarga Sejahtera, KUD Sawit Makmur Bersama. The evidence of banner installation as per "Berita Acara Pemasangan Baliho Patok Batas di Kavling Petani" dated 9 November 2019.
Root Cause Analysis:	<ul style="list-style-type: none"> • Lack of awareness from smallholder member because they deemed the existing boundary (palm frond) was sufficient. • There is no program of boundary pegs instalation
Corrective Actions:	<ul style="list-style-type: none"> • Socialization and awareness program to smallholder member regarding the boundary markers function and best management practices of agronomy. • Develop the program of monitoring smallholder plantation block/kavling condition to ensure the kavling of smallholder were follow the rules and standard of procedure including the boundary markers. • Plasma Bungo Tebo has made the socialization and awareness program to smallholder member regarding the boundary markers function and best management practices of agronomy as per "Jadwal Sosialisasi Pemasangan

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	<p>Patok Batas Kapling Kebun Plasma KLO 2019 – 2020”. Program is applicable at all KUD.</p> <ul style="list-style-type: none"> • Program of monitoring smallholder plantation block/kavling condition also has been made by Plasma Bungo Tebo each month. The monitoring result also review by Plasma Bungo Tebo through monthly management review (Estate Monthly Meeting). Latest management review conducted on 31 October 2019, to review the inspection/monitoring result of January - July 2019. Minutes of management review are available, follow up action of management review can be demonstrated. • In addition, Plasma Bungo Tebo management has issued the Memorandum No. 020/RAU/KLO/MEMO/10/19 dated 28 October 2019. Memorandum is concerning Role and Responsibility “Rencana Jangka Panjang Pemasangan Patok kavling”.
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Legal boundary pegs smallholders plot are found accordingly and there are the regular monitoring has done to ensure the boundary pegs are maintain and available.</p> <p>The NC has been CLOSED on 13 November 2019.</p>

Nonconformity			
NCR Ref #	1839713-201910-M2	Clause & Category (Major / Minor)	General Chain of Custody Requirements for the Supply Chain Indicator 5.13.2 Major
Date Issued	25 October 2019	Due Date	22 January 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 November 2019
Statement of Nonconformity:	The information input to management review of RSPO SCCS were not sufficient according to the RSPO minimum requirement.		
Requirement Reference:	<p>The input to management review shall include information on: Results of internal audits covering RSPO Supply Chain Certification Standard.</p> <ul style="list-style-type: none"> - Customer feedback. - Status of preventive and corrective actions. - Follow-up actions from management reviews. - Changes that could affect the management system. - Recommendations for improvement. 		
Objective Evidence:	<p>Internal audit RSPO SCCS conducted on 8 – 9 January 2019, while management review conducted on 1 July 2019.</p> <p>According to “Notulen Management review” shown that:</p>		

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	<ul style="list-style-type: none"> - Result of audit discuss were not inline with audit result on 8 – 9 January 2019. There was 1 finding of RSPO SCCS however in the management review were not review/discussed. - Process performance and product conformity were review accordingly. - Customer feedback were not review accordingly and stated as N/A - Status of preventive and corrective action were not review accordingly and stated as N/A - Follow up action from previous management review were not review accordingly and stated as N/A - Changes that could affect the management system were not review and stated as N/A. - No proper attendant list were available.
<p>Corrections:</p>	<ul style="list-style-type: none"> • Bungo Tebo POM management has conducted re management review on 30 October 2019. Minutes of management review can be demonstrated as per "Notulen Management Review" dated 30 October 2019. Management review attend by Mill manager and its suborbdiinat. Input of management review has include: <ul style="list-style-type: none"> ✓ Result of audit both internal and external audit. There were 3 issue discussing from internal and external audit and follow up action has been taken and addressed accordingly. ✓ Process performance and product conformity: there were 3 issues discussed regarding QC visit result such as kernel losses and Unstrip Bunch losses. Correction and corrective action to addressed the issue has been done. ✓ Recommendation for improvement: there were 2 issues discussed regarding VE result such as: improving the electromotor and water recycling from boiler door cooling water to water basin. ✓ Customer feedback: There were issues feedback regarding the transporter input to assist the broken unit of CPO transport during transporting within the plantation road. ✓ Status of Preventive and corrective action: The status of corrective and preventive action has been closed and effectively implemented. ✓ Follow up actions from previous management review: The issues raised from previous management review has been followed up accordingly. ✓ Changes that could affect the management system: There is no changing in the mill operation and management system.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • Lack of understanding from management regarding the requirement of management review input according to RSPO SCCS 2017 standard. • Management review has been conducted regularly by Bungo Tebo POM management, however the agenda is only specific to review the operation performance.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Group Manager PT Rigunas Agri Utama has issued the Memorandum No. 002/RAU/MEMO/10/19 dated 31 October 2019 concerning the standard of

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	<p>management review of RSPO Supply chain for Mill and KCP according to RSPO SCCS 2017.</p> <ul style="list-style-type: none"> • Management PT Rigunas Agri Utama has conducted the training regarding RSPO SCCS 2017 including the requirement of Management review input. The training deliver by Head Office personel Welly Joel to PIC Sustainability PT Rigunas Agri Utama – Bungo Tebo POM and Bungo tebo POM & KCP personel on 7 November 2019. Record of training including training material, minutes of training and attendant list are available and can be demonstrated. • Management review schedule and program has been made by Mill management as per “Jadwal Rapat Management Review SCCS 2019 – 2020” dated 29 October 2019. Management review scheduled twice a year in April and October 2020.
<p>Assessment Conclusion:</p>	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Management review has been done accordingly refer to RSPO SCCS requirement. All issue has been discussed related to performance implementation of RSPO SCCS. Mill Manager and the team has understanding on RSPO SCCS standard and requirement particularly for management review. Management review schedule and program has been made as well.</p> <p>The NC has been CLOSED on 13 November 2019.</p>

Nonconformity			
<p>NCR Ref #</p>	<p>1839713-201910-M3</p>	<p>Clause & Category (Major / Minor)</p>	<p>General Chain of Custody Requirements for the Supply Chain Indicator 5.13.3 Major</p>
<p>Date Issued</p>	<p>25 October 2019</p>	<p>Due Date</p>	<p>22 January 2020</p>
<p>Closed (Yes / No)</p>	<p>Yes</p>	<p>Date of nonconformity Closure</p>	<p>13 November 2019</p>
<p>Statement of Nonconformity:</p>	<p>Action taken from the management review result were not appropriate due to the insufficient input of management review.</p>		
<p>Requirement Reference:</p>	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of the management system and its processes. - Resource needs. 		
<p>Objective Evidence:</p>	<p>Internal audit RSPO P & C conducted on 1 – 4 October 2019. Internal audit RSPO SCCS conducted on 8 – 9 January 2019, while management review conducted on 1 July 2019. According to “Notulen Management review” shown that:</p>		

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	<ul style="list-style-type: none"> ✓ Result of audit discuss were not inline with audit result on 8 – 9 January 2019. There was 1 finding of RSPO SCCS however in the management review were not review/discussed. ✓ Process performance and product conformity were review accordingly. ✓ Customer feedback were not review accordingly and stated as N/A ✓ Status of preventive and corrective action were not review accordingly and stated as N/A ✓ Follow up action from previous management review were not review accordingly and stated as N/A ✓ Changes that could affect the management system were not review and stated as N/A. ✓ No proper attendant list were available.
<p>Corrections:</p>	<ul style="list-style-type: none"> • Bungo Tebo POM management has conducted re management review on 30 October 2019. Minutes of management review can be demonstrated as per "Notulen Management Review" dated 30 October 2019. Management review attend by Mill manager and its suborbdiat. output of management review has include the Improvement of the effectiveness of the management system and its processes and resource needs.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • Lack of understanding from management regarding the requirement of management review input according to RSPO SCCS 2017 standard. • Management review has been conducted regularly by Bungo Tebo POM management, however the agenda is only specific to review the operation performance.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Group Manager PT Rigunas Agri Utama has issued the Memorandum No. 002/RAU/MEMO/10/19 dated 31 October 2019 concerning the standard of management review of RSPO Supply chain for Mill and KCP according to RSPO SCCS 2017. • Management PT Rigunas Agri Utama has conducted the training regarding RSPO SCCS 2017 including the requirement of Management review input. The training deliver by Head Office personel Welly Joel to PIC Sustainability PT Rigunas Agri Utama – Bungo Tebo POM and Bungo tebo POM & KCP personel on 7 November 2019. Record of training including training material, minutes of training and attendant list are available and can be demonstrated. • Management review schedule and program has been made by Mill management as per "Jadwal Rapat Management Review SCCS 2019 – 2020" dated 29 October 2019. Management review scheduled twice a year in April and October 2020.
<p>Assessment Conclusion:</p>	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Management review has been done accordingly refer to RSPO SCCS requirement. All input required in RSPO SCCS has been discussed related to performance implementation of RSPO SCCS. The output of management review has inline with the input discussed. Mill Manager and the team has understanding on RSPO SCCS standard and requirement particularly for management review. Management review schedule and program has been made as well.</p> <p>The NC has been CLOSED on 13 November 2019.</p>

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Nonconformity																								
NCR Ref #	1839713-201910-M4	Clause & Category (Major / Minor)	General Chain of Custody Requirements for the Supply Chain Indicator 5.9.1 Major																					
Date Issued	25 October 2019	Due Date	22 January 2020																					
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 November 2019																					
Statement of Nonconformity:	There are discrepancy between CSPK sold volume and CSPK delivery according to Book Keeping Mass Balance during period March October 2019. It was indicated over sold volume of CSPK.																							
Requirement Reference:	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.																							
Objective Evidence:	<p>According to delivery for of CSPK and CSPK Book Keeping Mass Balance 2019, shown that since March – October 2019, CSPK delivery to KCP Bungo Tebo was 3,727.400 MT.</p> <p>Whilst according to RSPO Palm trace Transaction, since 2019 (March – October 2019), confirmed that the volume of CSPK transaction was 4,509.76 MT.</p> <p>There was discrepancy of 782 MT of CSPK sold volume.</p>																							
Corrections:	<p>Review and correcting the book keeping period January – November 2019 according to actual CPO delivery and for the further transaction shipping announcement will be made immediately after the transaction done.</p> <p>Bungo Tebo POM has review the book keeping period January – November 2019. According to book keeping, it can be demonstrated that during period January – November 2019, certified PK delivery of Bungo Tebo POM was 4,783.760 MT, while CSPK sold volume based on Plamtrace transaction, during new licence period 2019 (March – October 2019) was 4,509.76 MT. Below are the detail of CSPK delivery vs Announcement Palmtrace RSPO since December 2018 – October 2019:</p> <table border="1" data-bbox="534 1601 1428 1993"> <thead> <tr> <th>Month</th> <th>CSPK Delivery (MT)</th> <th>CSPK Announcement Palmtrace (MT)</th> </tr> </thead> <tbody> <tr> <td>January 2019</td> <td>567.730</td> <td>-</td> </tr> <tr> <td>February 2019</td> <td>317.650</td> <td>-</td> </tr> <tr> <td>March 2019</td> <td>379.820</td> <td>1,717.750</td> </tr> <tr> <td>April 2019</td> <td>299.330</td> <td>-</td> </tr> <tr> <td>May 2019</td> <td>727.080</td> <td>-</td> </tr> <tr> <td>June 2019</td> <td>378.300</td> <td>-</td> </tr> </tbody> </table>			Month	CSPK Delivery (MT)	CSPK Announcement Palmtrace (MT)	January 2019	567.730	-	February 2019	317.650	-	March 2019	379.820	1,717.750	April 2019	299.330	-	May 2019	727.080	-	June 2019	378.300	-
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	July 2019	591.690	243.22
	August 2019	497.430	906.67
	September 2019	382.260	1,444.45
	October 2019	642.470	197.67
	Total	4,783.760	4,509.76
<p>There are CSPK delivery on January and February as much as 885.380 MT, while the announcement was done on March 2019. So that there is no overs sold volume during period March – October 2019 according to actual transaction of CSPK delivery.</p> <p>Data seen during audit:</p> <p>CSPK Delivery Form January 2019 No. KCP PBT 4101 SS, dated 31 January 2019, quantity 567,730 MT, Certified PK RSPO 620917.</p> <p>CSPK Delivery Form February 2019 No. KCP PBT 4102 SS, dated 28 February 2019, quantity 317,650 MT, Certified PK RSPO 620917.</p> <p>Marketing team, Mill management and sustainability RO has made coordination to fix the RSPO palmtrace announcement based on actual delivery and directly announce after CSPK delivery.</p>			
Root Cause Analysis:	<ul style="list-style-type: none"> Announcement in plamtrace was done based on CPKO delivery with conversion factor 45% and Shipping announcement was done after 3 month delivery. There are CSPK delivery/sold on period January & February 2019, while the announcement in Palm trace was done on March 2019. 		
Corrective Actions:	<ul style="list-style-type: none"> Monitoring of book keeping each month and ensuring the CSPK delivery is made from positive stock and balance in 3 month period. Ensuring the shipping announcement at Palmtrace transaction was done after CSPK delivery/sales. 		
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Correction data of book keeping and mass balance of CSPK has demonstrated and there is no over sold volume of CSPK based on actual transaction. Company has commitment to announce the next transaction at the Palmtrace immediately no later than one month.</p> <p>The NC has been CLOSED on 13 November 2019.</p>		

Nonconformity			
NCR Ref #	1839713-201910-M5	Clause & Category (Major / Minor)	Module E Mass Balance, E.5.1.c Major
Date Issued	25 October 2019	Due Date	22 January 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 November 2019

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Statement of Nonconformity:	There are over sold volume of CSPK on period 2019 (March – October 2019) compare to Book Keeping Mass Balance of PK 2019 period March – October 2019.																																				
Requirement Reference:	The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)																																				
Objective Evidence:	<p>According to delivery for of CSPK and CSPK Book Keeping Mass Balance 2019, shown that since March – October 2019, CSPK delivery to KCP Bungo Tebo was 3,727,400 MT.</p> <p>Whilst according to RSPO Palm trace Transaction, since 2019 (March – October 2019), confirmed that the volume of CSPK transaction was 4,509.76 MT.</p> <p>a) There was discrepancy of 782 MT of CSPK sold volume.</p>																																				
Corrections:	<p>Review and correcting the book keeping period January – November 2019 according to actual CPO delivery and for the further transaction shipping announcement will be made immediately after the transaction done.</p> <p>Bungo Tebo POM has review the book keeping period January – November 2019. According to book keeping, it can be demonstrated that during period January – November 2019, certified PK delivery of Bungo Tebo POM was 4,783.760 MT, while CSPK sold volume based on Plamtrace transaction, during new licence period 2019 (March – October 2019) was 4,509.76 MT. Below are the detail of CSPK delivery vs Announcement Palmtrace RSPO since December 2018 – October 2019:</p> <table border="1" data-bbox="534 1108 1423 1765"> <thead> <tr> <th>Month</th> <th>CSPK Delivery (MT)</th> <th>CSPK Announcement Palmtrace (MT)</th> </tr> </thead> <tbody> <tr> <td>January 2019</td> <td>567.730</td> <td>-</td> </tr> <tr> <td>February 2019</td> <td>317.650</td> <td>-</td> </tr> <tr> <td>March 2019</td> <td>379.820</td> <td>1,717.750</td> </tr> <tr> <td>April 2019</td> <td>299.330</td> <td>-</td> </tr> <tr> <td>May 2019</td> <td>727.080</td> <td>-</td> </tr> <tr> <td>June 2019</td> <td>378.300</td> <td>-</td> </tr> <tr> <td>July 2019</td> <td>591.690</td> <td>243.22</td> </tr> <tr> <td>August 2019</td> <td>497.430</td> <td>906.67</td> </tr> <tr> <td>September 2019</td> <td>382.260</td> <td>1,444.45</td> </tr> <tr> <td>October 2019</td> <td>642.470</td> <td>197.67</td> </tr> <tr> <td>Total</td> <td>4,783.760</td> <td>4,509.76</td> </tr> </tbody> </table> <p>There are CSPK delivery on January and February as much as 885.380 MT, while the announcement was done on March 2019. So that there is no overs sold volume during period March – October 2019 according to actual transaction of CSPK delivery.</p> <p>Data seen during audit: CSPK Delivery Form January 2019 No. KCP PBT 4101 SS, dated 31 January 2019, quantity 567,730 MT, Certified PK RSPO 620917.</p>	Month	CSPK Delivery (MT)	CSPK Announcement Palmtrace (MT)	January 2019	567.730	-	February 2019	317.650	-	March 2019	379.820	1,717.750	April 2019	299.330	-	May 2019	727.080	-	June 2019	378.300	-	July 2019	591.690	243.22	August 2019	497.430	906.67	September 2019	382.260	1,444.45	October 2019	642.470	197.67	Total	4,783.760	4,509.76
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	<p>CSPK Delivery Form February 2019 No. KCP PBT 4102 SS, dated 28 February 2019, quantity 317,650 MT, Certified PK RSPO 620917.</p> <p>Marketing team, Mill management and sustainability RO has made coordination to fix the RSPO palmtrace announcement based on actual delivery and directly announce after CSPK delivery.</p>
Root Cause Analysis:	<ul style="list-style-type: none"> Announcement in plamtrace was done based on CPKO delivery with conversion factor 45% and Shipping announcement was done after 3 month delivery. There are CSPK delivery/sold on period January & February 2019, while the annpouncement in Palm trace was done on March 2019.
Corrective Actions:	<ul style="list-style-type: none"> Monitoring of book keeping each month and ensuring the CSPK delivery is made from positive stock and balance in 3 month period. Ensuring the shipping announcement at Palmtrace transaction was done after CSPK delivery/sales.
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Correction data of book keeping and mass balance of CSPK has demonstrated and there is no over sold volume of CSPK based on actual transaction. Company has commitment to announce the next transaction at the Palmtrace immediately no later than one month.</p> <p>The NC has been CLOSED on 13 November 2019.</p>

Nonconformity			
NCR Ref #	1839713-201910-N1	Clause & Category (Major / Minor)	RSPO P & C INA Ni 2016 indicator 4.1.3 minor
Date Issued	25 October 2019	Due Date	Next Surveillance
Closed (Yes / No)	No	Date of nonconformity Closure	-
Statement of Nonconformity:	Record of monitoring of operations procedures at Plasma Bungo Tebo are available, however there is no evidence of follow-up actions.		
Requirement Reference:	Records of monitoring and any follow-up actions shall be available.		
Objective Evidence:	<p>Monitoring and inspection of plantation block of smallholder member for each KUD has been developed, however the follow up action were not available. It was also found during field visit:</p> <ul style="list-style-type: none"> Kavling 1369 KUD Sawit Tanduk Perkasa: weeds condition uncontrolled. According to monitoring result on 31/07/2019 also confirmed that weeds condition were uncontrolled, 1 boundary pegs were not available. There is no follow up action. Kavling 1362 KUD Sawit Tanduk Perkasa: Frond stacking were not implemented, 1 boundary pegs were not available. According to monitoring result on 31/07/2019 1 boundary pegs were not available. There is no follow up action. 		

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	<ul style="list-style-type: none"> - Kavling 407 KUD Sumay Makmur: 1 boundary pegs were not available, weeds condition uncontrolled, frond stacking were not implemented. Monitoring result on 07/01/2019 were not follow up. - Kavling 280 KUD Sumay makmur: weeds condition uncontrolled, frond stacking were not implemented - Kavling 475 KUD Barokah: 1 boundary pegs were not available, frond stacking were not implemented. - Kavling 668 KUD Barokah: weeds condition uncontrolled, frond stacking were not implemented - Kavling 1529 KUD Sawit Makmur Bersama: weeds condition uncontrolled, frond stacking were not implemented - Kavling 1375 KUD Sawit Tanduk Perkasa: weeds condition uncontrolled, frond stacking were not implemented. <p>Based on Monitoring result on 07/01/2019 above which done by Plasma Management Bungo Tebo, there is no follow up action were evident againts the finding.</p>
Corrections:	<ul style="list-style-type: none"> - Plasma Bungo Tebo Management taken action to record the follow up action which has been done in the field accordingly and review the effectiveness of follow up action taken.
Root Cause Analysis	<ul style="list-style-type: none"> - Plasma management doesn't record the follow up action of monitoring result - There is no review of follow up action against the monitoring result
Corrective Actions:	<ul style="list-style-type: none"> - Review regularly the monitoring result of smallholder block to determine the follow up action and record all the follow up action taken and kept the record at the Plasma Office.
Assessment Conclusion:	Will be verified in the next surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	

Positive Findings	
PF #	Description
PF 1	

3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1679639-201809-N1	Clause & Category (Major / Minor)	RSPO P&C INA NI, September 2016 - Indicator 2.2.2
Date Issued	27 September 2018	Due Date	ASA 4 Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	Escalated to Major NC
Statement of Nonconformity:	Legal boundary pegs in sample of smallholders plot are not found.		
Requirement Reference:	Legal boundaries are demonstrated clearly and maintained.		
Objective Evidence:	Based on field visit at sample smallholders plot "Koperasi Sejahtera Tani" (Hampanan 51 and Hampanan 108) on 21 September 2018, it is clearly: 1. Kavling/Plot No. 2307 (Saad Amri Aziz), 2 boundary pegs not founded. 2. Kavling/Plot No. 3163 (Mushadi); 3161 (Azwir A); 3170 (Khoiriah/Darman), all boundary pegs are not founded.		
Corrections:	Installing smallholders plot missing pegs at Hampanan 51 and Hampanan 108 (Koperasi Sejahtera Tani): 1. Kavling/Plot No. 2307 (Saad Amri Aziz), 2 boundary pegs installed. 2. Kavling/Plot No. 3163 (Mushadi); 3161 (Azwir A); 3170 (Khoiriah/Darman), all boundary pegs installed.		
Root Cause Analysis:	Missing boundary pegs due to human/cattle disturbance are not well identified and monitored.		
Corrective Actions:	<ul style="list-style-type: none"> - Monitoring of boundary pegs condition by smallholders assistant in accordance with available program. - Create monitoring plan on boundary pegs for entire smallholders cooperative plots. - Create letter of assignment for person in charge who responsible to check and monitor smallholders plot condition of each cooperative. - Create schedule of management review on boundary pegs monitoring result. 		
Assessment Conclusion:	During field visit at smallholder kavling, it still found the missing boundary markers of smallholder kavling: <ul style="list-style-type: none"> - Kavling 1369 KUD Sawit Tanduk Perkasa: 1 boundary pegs were not available. There is no follow up action. - Kavling 1362 KUD Sawit Tanduk Perkasa: 1 boundary pegs were not available. According to monitoring result on 31/07/2019 1 boundary pegs were not available. There is no follow up action. - Kavling 407 KUD Sumay Makmur: 1 boundary pegs were not available. Monitoring result on 07/01/2019 were not follow up. - Kavling 475 KUD Barokah: 1 boundary pegs were not available. 		

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Minor NC was Escalated to Major NC above See 1839713-201910-M1.

Nonconformity			
NCR Ref #	1679639-201809-N2	Clause & Category (Major / Minor)	RSPO P&C INA NI, September 2016 - Indicator 4.7.6 minor
Date Issued	27 September 2018	Due Date	ASA 4 Assessment
Closed (Yes / No)	Yes	Date of nonconformity Closure	24 October 2019
Statement of Nonconformity:	Medical and incident/social insurance (BPJS) for all workers are not properly covered.		
Requirement Reference:	All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).		
Objective Evidence:	<p>Based on Employee Data Record in Bungo Tebo Estate on August 2018 totally 735 workers consist of Monthly Permanent Workers (SKU-B) – 4.63%, Daily Permanent Workers (SKU-H) – 17.28% and Casual Daily Workers (PHL) – 78.10%.</p> <p>However, based on Summary of Jamsostek Payment No. Ref: KBT EE.00.0952 within period June to August 2018, shows that several workers of PT Rigunas Agri Utama are not covered by social insurance (Jamsostek) as per regulation required. Collecting evidence as follow:</p> <ul style="list-style-type: none"> - August 2018, payment validation number: 11001511001103241314, paid for 339 workers (SKU-H and PHL). - July 2018, payment validation number: 110015461808, paid for 356 workers (SKU-H and PHL). - June 2018, paid for 350 workers (SKU-H and PHL). <p>Sample workers has verified: Mr. Zainuddin, Mr. Akmal, Mr. Jamhuri, Mr. Andi Shaputra and Mr. Munika Auzandi.</p>		
Corrections:	Proposing of Mr. Zainuddin, Mr. Akmal, Mr. Jamhuri, Mr. Andi Shaputra and Mr. Munika Auzandi to registering on insurance.		
Root Cause Analysis:	<ul style="list-style-type: none"> • Unsatisfaction from smallholders related spraying quality of sprayer team (TUS), then they make own spraying. • Some smallholders cooperative selling an agrochemical freely, therefore the farmers easily to obtain and applied spraying in their plots. 		
Corrective Actions:	<ul style="list-style-type: none"> – Inventory the workers who have not registered in Jamsostek/insurance program and develop registration program for social insurance every 6 month. – Make an agreement with employees who have not registered with social insurance and new employees must agree to be register and pay contributions for social insurance programs under applicable regulations. – During ASA-4 in October 2019, PT Rigunas Agri Utama has demonstrated the medical insurance (BPJS) has covered for all employee, Data seen: 		

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	<ul style="list-style-type: none"> • Payment record for BPJS Kesehatan (social insurance); month September 2019, reference number: 191001310967, IDR XX,927,090 via Mandiri Bank, covered for all workers in Bungo Tebo Estate (total workers: 262). Status is Paid. • Payment record for BPJS Ketengakerjaan (incidences record); month September 2019; total payment IDR XX,523,337 via Mandiri Bank, covered for all workers in Bungo Tebo Estate (total workers is 262). Status is Paid.
Assessment Conclusion:	According to verification of correction and corrective action taken by PT RIGUNAS Agri Utama above, conclude that the correction and corrective action has effectively implemented and during audit ASA 4 they found still consistent. All workers of Bungo Tebo POM and Estate has covered by medical and incident/social insurance (BPJS). So that the nn conformity has been Closed.

Nonconformity													
NCR Ref #	1679639-201809-N3	Clause & Category (Major / Minor)	RSPO P&C INA NI, September 2016 - Indicator 4.6.4 minor										
Date Issued	27 September 2018	Due Date	ASA 4 Assessment										
Closed (Yes / No)	Yes	Date of nonconformity Closure	24 October 2019										
Statement of Nonconformity:	PT Rigunas Agri Utama – Bungo Tebo cannot demonstrate that use of Gramoxone (a.i. Paraquat dichloride) will eliminated and only use for exceptional circumstances.												
Requirement Reference:	The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.												
Objective Evidence:	<p>The certificate holder has monitor use of Gramoxone (a.i. Paraquat dichloride) annually: Bungo Tebo Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Volume (L)</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1,182</td> </tr> <tr> <td>2016</td> <td>2,670</td> </tr> <tr> <td>2017</td> <td>5,915</td> </tr> <tr> <td>2018*</td> <td>3,281</td> </tr> </tbody> </table> <p>*data Jan-Aug 2018</p> <p>During audit on September 2018, use of Gramoxone (a.i. Paraquat dichloride) is decrease compare with 2017. The Certificate Holder has made strategic planning to reduce Gramoxone (a.i. Paraquat dichloride) totally 896 Liter as per mention in "Program Rencana Pengurangan Penggunaan Bahan Kimia (Pestisida) TM dan TBM Kebun Bungo Tebo – 2018". However, there is no plan to eliminate use of Gramoxone (a.i. Paraquat dichloride).</p>			Year	Volume (L)	2015	1,182	2016	2,670	2017	5,915	2018*	3,281
Year	Volume (L)												
2015	1,182												
2016	2,670												
2017	5,915												
2018*	3,281												
Corrections:	Bungo Tebo Estate has no longer use paraquat since October 2019. According to record of paraquat usage "Pemakaian Gramoxone 2019" shown that latest paraquat usage												

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	<p>was in May 2019 as much as 7.2 L for semprot anak kayu (hard weeds control) at Block D08e Afd IV. Total paraquat usage since January – May 2019 at Bungo Tebo Estate was 79.10 L. During observation at agrochemical warehouse can be prove that there is no longer Gramoxone (paraquat) stock at warehouse.</p> <p>Asian Agri Top management has issued the letter (email) on 20 August 2019 to all Plantation Regional Head which stated that paraquat usage maximum until the end of September 2019 and the stock of paraquat by end of September 2019 must be zero (0).</p>
Root Cause Analysis:	Long term program to eliminating Gramoxone (Paraquat dichloride) not available.
Corrective Actions:	<p>Eliminating Gramoxone (Paraquat dichloride) since October 2019.</p> <p>Asian Agri Top management has issued the letter (email) on 20 August 2019 to all Plantation Regional Head which stated that paraquat usage maximum until the end of September 2019 and the stock of paraquat by end of September 2019 must be zero (0).</p> <p>Company has determined the substitution of paraquat with other chemical (Basta - Amonium glufosinat).</p>
Assessment Conclusion:	According to verification of correction and corrective action taken by PT Rigunas Agri Utama above, conclude that the correction and corrective action has effectively implemented and during audit ASA 4 they found still consistent, by end of September 2019 there is no more paraquat usage. So that the non conformity has been Closed.

Nonconformity			
NCR Ref #	1679639-201809-N4	Clause & Category (Major / Minor)	RSPO P&C INA NI, September 2016 - Indicator 4.7.7
Date Issued	27 September 2018	Due Date	ASA 4 Assessment
Closed (Yes / No)	Yes	Date of nonconformity Closure	24 October 2019
Statement of Nonconformity:	Occupational accident investigation record is filled incomplete to helping root cause analysis and to prepare corrective action.		
Requirement Reference:	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.		
Objective Evidence:	<p>Sample of work accident investigation sheet on Bungo Tebo Estate and Bungo Tebo Mill:</p> <ul style="list-style-type: none"> • Accident Mr.S (harvester), 22 January 2018 eyes irritated from palm debris, located in block A94K. Investigation carried out, however the incident investigation form (why-tree form) to identify root cause and preparing correction has not been filled up completely. • Accident Mr. D (harvester), 18 April 2018, injured leg from fallen palm frond, accident occurred during harvesting block D08m. Investigation form (why-tree form) was not completely filled in order to analyzing root cause and preparing correction. 		

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	<ul style="list-style-type: none"> Mr.H (Loading ramp), 17 January 2018 head injured from FFB flattening plate located on loading ramp. Investigation carried out, however accident investigation form to identify root cause and preparing correction has not been filled up completely.
Corrections:	Revising accident investigation sheet/form for Mr.S (harvester), 22 January 2018, Mr. D (harvester), 18 April 2018, Mr.H (Loading ramp), 17 January 2018.
Root Cause Analysis:	Less competency of personal in charge who responsible for accident investigation.
Corrective Actions:	<p>Refreshment training related accident investigation procedure to all supervisor (assistant and foreman).</p> <p>Data verification during ASA4;</p> <ul style="list-style-type: none"> Based on document review related to Accidents Report year 2019, there were reported 8 accidents with category is low (medical aid) – no medium or major category reported. The document of Accidents Investigation shown sufficient and there was conducted for all category of accidents, e.g: Report of Accident Investigation dated 14th August 2019 namely Mrs IAS (harvester), location of accidents in division IV block D08D. The corrective has followed up and implementation. The recommendation for corrective action is available.
Assessment Conclusion:	According to verification of correction and corrective action taken by PT RIGUNAS Agri Utama above, conclude that the correction and corrective action has effectively implemented and during audit ASA 4 they found still consistent. Occupational accident investigation record has filled completely with sufficient root cause analysis and the corrective action taken was inline. So that the non conformity has been Closed.

Opportunity for Improvement	
OFI#	Description
OFI 1	PT Rigunas Agri Utama has established procedures for providing PPE, for example: safety shoes have been given to operators at Bunga Tebo POM once a year. Based on interviews with workers in the grading area, Sterilizer station and pressing station, there is confirmation that the safety shoes provided and currently in use cannot last up to one year.

Positive Findings	
PF #	Description
PF 1	Company has made the continual improvement of best management practise both in Mill and Estate.

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1137714M1	Major	1.1.1	19/12/2014	closed on 17/06/2015
1137714M2	Major	1.1.2	19/12/2014	closed on 17/06/2015
1137714M3	Major	1.2.1	19/12/2014	closed on 17/06/2015

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1137714M4	Major	2.1.1	19/12/2014	closed on 17/06/2015
1137714M5	Major	2.2.1	19/12/2014	closed on 17/06/2015
1137714M6	Major	4.7.1	19/12/2014	closed on 17/06/2015
1137714M7	Major	4.7.2	19/12/2014	closed on 17/06/2015
1137714M8	Major	4.8.1	19/12/2014	closed on 17/06/2015
1137714M9	Major	5.6.2	19/12/2014	closed on 17/06/2015
1137714M10	Major	5.2.2	19/12/2014	closed on 17/06/2015
1137714M11	Major	6.1.3	19/12/2014	closed on 17/06/2015
1137714M12	Major	6.4.1	19/12/2014	closed on 17/06/2015
1137714M13	Major	6.4.2	19/12/2014	closed on 17/06/2015
1137714M14	Major	6.13.1	19/12/2014	closed on 17/06/2015
1137714M15	Major	6.3.2	19/12/2014	closed on 17/06/2015
1137714M16	Major	6.7.1	19/12/2014	closed on 17/06/2015
1137714N1	Minor	1.3.1	19/12/2014	closed on 22/09/2016.
1137714N2	Minor	2.1.2	19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N3	Minor	2.1.3	19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N4	Minor	2.2.2	19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N5	Minor	3.1.2	19/12/2014	closed on 22/09/2016.
1137714N6	Minor	4.7.5	19/12/2014	closed on 22/09/2016.
1137714N7	Minor	4.8.2	19/12/2014	closed on 22/09/2016.
1137714N8	Minor	4.1.2	19/12/2014	closed on 22/09/2016.
1137714N9	Minor	5.1.2	19/12/2014	closed on 22/09/2016.
1137714N10	Minor	5.1.3	19/12/2014	closed on 22/09/2016.
1137714N11	Minor	5.3.3	19/12/2014	closed on 22/09/2016.
1137714N12	Minor	5.2.3	19/12/2014	Escalated into Major NC #1378035M12. Closed on 21/11/2016.
1137714N13	Minor	5.2.4	19/12/2014	closed on 22/09/2016.
1137714N14	Minor	6.1.4	19/12/2014	Escalated into Major NC #1378035M14. Closed on 21/11/2016.

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1137714N15	Minor	6.2.3	19/12/2014	closed on 22/09/2016.
1137714N16	Minor	6.10.1	19/12/2014	closed on 22/09/2016.
1137714N17	Minor	6.10.4	19/12/2014	closed on 22/09/2016.
1137714N18	Minor	6.11.1	19/12/2014	closed on 22/09/2016.
1378035M1	Major	1.1.2	22/09/2016	closed on 21/11/2016.
1378035M2	Major	1.2.1	22/09/2016	closed on 21/11/2016.
1378035M3	Major	2.1.1	22/09/2016	closed on 21/11/2016.
1378035M4	Major	2.1.2	22/09/2016	closed on 21/11/2016.
1378035M5	Major	2.1.3	22/09/2016	closed on 21/11/2016.
1378035M6	Major	2.2.2	22/09/2016	closed on 21/11/2016.
1378035M7	Major	2.3.1	22/09/2016	closed on 21/11/2016.
1378035M8	Major	4.6.5	22/09/2016	closed on 21/11/2016.
1378035M9	Major	4.7.1	22/09/2016	closed on 21/11/2016.
1378035M10	Major	4.7.2	22/09/2016	closed on 21/11/2016.
1378035M11	Major	4.7.3	22/09/2016	closed on 21/11/2016.
1378035M12	Major	5.2.3	22/09/2016	closed on 21/11/2016.
1378035M13	Major	5.3.1	22/09/2016	closed on 21/11/2016.
1378035M14	Major	6.1.4	22/09/2016	closed on 21/11/2016.
1378035M15	Major	6.7.1	22/09/2016	closed on 21/11/2016.
1378035M16	Major	6.8.1	22/09/2016	closed on 21/11/2016.
1378035M17	Major	6.9.1	22/09/2016	closed on 21/11/2016.
1378035M18	Major	6.9.2	22/09/2016	closed on 21/11/2016.
1378035M19	Major	6.13.1	22/09/2016	closed on 21/11/2016.
1378035N1	Minor	4.1.2	22/09/2016	Escalated into Major NC #1550974-201711-M1. Closed on 17/01/2018.
1378035N2	Minor	4.3.6	22/09/2016	Escalated into Major NC #1550974-201711-M2. Closed on 17/01/2018.
1378035N3	Minor	6.9.3	22/09/2016	Closed on 21/11/2017
1550974-201711-M1	Major	4.1.2	22/11/2017	Closed on 17/01/2018
1550974-201711-M2	Major	4.3.6	22/11/2017	Closed on 17/01/2018
1550974-201711-M3	Major	4.6.6	22/11/2017	Closed on 17/01/2018
1550974-201711-M4	Major	4.7.1	22/11/2017	Closed on 17/01/2018
1550974-201711-M5	Major	4.7.3	22/11/2017	Closed on 17/01/2018

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1550974-201711-M6	Major	5.3.2	22/11/2017	Closed on 17/01/2018
1550974-201711-M7	Major	SCC-E.5.1	22/11/2017	Closed on 19/12/2017
1550974-201711-N1	Minor	5.3.3	22/11/2017	Escalated to MAJOR 1679639-201809-M4
1679639-201809-M1	Major	2.1.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M2	Major	4.5.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M3	Major	4.7.2	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M4	Major	5.3.3	27/09/2018	Escalation of Minor 1550974-201711-N1
1679639-201809-M5	Major	6.5.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M6	Major	6.12.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-N1	Minor	2.2.2	27/09/2018	Escalated to Major NC 1839713-201910-M1, Closed on 13 November 2019
1679639-201809-N2	Minor	4.7.6	27/09/2018	Closed on 24/10/2019
1679639-201809-N3	Minor	4.6.4	27/09/2018	Closed on 24/10/2019
1679639-201809-N4	Minor	4.7.7	27/09/2018	Closed on 24/10/2019
1839713-201910-M1	Major	2.2.2	25/10/2019	Closed on 13 November 2019
1839713-201910-M2	Major	SCC 5.13.2	25/10/2019	Closed on 13 November 2019
1839713-201910-M3	Major	SCC 5.13.3	25/10/2019	Closed on 13 November 2019
1839713-201910-M4	Major	SCC 5.9.1	25/10/2019	Closed on 13 November 2019
1839713-201910-M5	Major	SCC E.5.1.c	25/10/2019	Closed on 13 November 2019
1839713-201910-N1	minor	4.1.3	25/10/2019	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 PT Inti Indosawit Subur – Muara Bulian POM Certification Unit’s 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

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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.

List of Stakeholders Contacted	
<p>Internal Stakeholders:</p> <ul style="list-style-type: none"> • Gender Committee PT Rigunas Agri Utama – Bungo Tebo • Worker Union PT Rigunas Agri Utama – Bungo Tebo • Sample Worker of PT Rigunas Agri Utama – Bungo Tebo (Mill and Estate) 	<p>Union/Contractors/Local Communities:</p> <ul style="list-style-type: none"> • Teriti Village Head and Community • Muaro Sekalo Village Head and Community • Representative of Smallholder Cooperative “Tunas Harapan”, Teluk Langkap village. • Representative of Smallholder Cooperative “Tani Mandiri”, Kandang village • Representative of Smallholder Cooperative “Sejahtera Tani”, Pundi Kalo village • Representative of Smallholder Cooperative “Tanjung Jaya Bersama”, Tuo Sumay village
<p>Government Departments:</p> <ol style="list-style-type: none"> 1. Dinas Tenaga Kerja Kabupaten Tebo (Manpower Office Tebo Regency) 2. Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Tebo (Plantation and Agricultural Agency Tebo Regency) 3. Dinas Lingkungan Hidup Kabupaten Tebo: (Environmental Agency Tebo Regency) 	<p>NGO: LSM Komisi Pencari Fakta</p>

IS #	Description
1	<p>Feedback: Dinas Tenaga Kerja dan Transmigrasi Kab. Tebo Bpk. Joko Kisworo , SP. (Kabid. Tenaga Kerja)</p> <ol style="list-style-type: none"> 1. Mandatory employment report mandatory have been reported to Disnakertrans Batanghari Regency 2. Company have been registered of all the workers to be BPJS Ketenagakerjaan and BPJS Kesehatan both of permanent workers as well as of temporary workers (BHL). 3. There is no child labor under the age of 18 in the company PT Rigunas Agri Utama. 4. PT Rigunas Agri Utama has SPBUN (Labor Union), the administration is complete. 5. PT Rigunas Agri Utama provides wages for its employees in accordance with the Provincial Minimum Wage Jambi (UMP) UMP 2019. <p>Management Responses:</p> <ul style="list-style-type: none"> • Conditions of Work must have a KTP and KK • The composition of the management of SPBU-SPSI PT. Rigunas Agri Utama 2013-2018 service period has ended and the company has reported the latest management for the 2018-2019 period to the Department of Industry, Trade and Labor Tebo Regency on October 11, 2019 chaired by Mr. TJ. Purba • Jambi Governor Decree No. 1103/KEP.GUB/DISNAKERS-3.3/2018 concerning the Establishment of the



	<p>Jambi Province Minimum Wage in 2019, dated October 24, 2018, stipulating the Jambi Province UMP in 2018 of Rp. 2,423,889.16 per month for 7 working hours a day and 40 working hours a week. Valid from 1 January 2019.</p> <ul style="list-style-type: none"> • HRD Manager RO3 Memorandum no. 002/HR-RO3/MEMO/01/2019, dated January 9, 2019 concerning 2019 Workers' Wages, a minimum wage of Rp 2,423,889.16 per month (25 HK) or Rp 96,955.57 per day. <p>Audit Team Findings: PT Rigunas Agri Utama has performed their responsibilities that must be carried out related to employment. Communication between company and workers and labor union as well as with manpower office is quite good. Determination of wages has referred to the applicable laws and regulations. Regarding casual workers (PHL), it has been well implemented and a check will be conducted at the next audit.</p>
<p>2</p>	<p>Feedbacks: Dinas Perkebunan, Peternakan dan Perikanan Kab. Batang Hari (Plantation, Agricultural and fisheries Agency of Batang Hari Regency) Bpk. Kholilul Ikhwan, S. Pt.</p> <ul style="list-style-type: none"> - PT Rigunas Agri Utama (PT RAU) regularly submits its Plantation Business Development Report (Laporan Perkembangan Usaha Perkebunan: LPUP) every semester. LPUP report for the first semester of 2019 has been reported. - The assessment of the palantation class (Penilaian Kelas Kebun) was conducted in 2017 with the results of Class II (Good), the reassessment will be carried out after 3 years, the assessment will be in 2020 - There are no complaints from the public regarding environmental pollution. - Indications of overlapping HGU of PT. RAU with SHM, as many as 293 plots in Pinang Belai Village are in the process of being finalized in the District Government Tebo through TP3 Kab. Tebo since August 2016. <p>Management Responses:</p> <ul style="list-style-type: none"> • LPUP is reported every semester to the Plantation Office. LPUP Semester I (January-June) 2019 PT RAU has been reported to the Dinas Perkebunan, Peternakan dan Perikanan Tebo Regency on October 10, 2019. • Assessment of garden classes based on Tebo Regent Decree Number 568 of 2017, dated December 14, 2017 concerning Penetapan Kelas Usaha Perkebunan PT. Rigunas Agri Utama (RAU) Kebun Bungo Tebo. With the results: Class II (Good) • There are no complaints related to environmental pollution • PT Rigunas Agri Utama has follow several mediation with Tebo Regent (Bupati) through Letter No.005/1347/ Disbun/2016, November 16, 2016 and also by the Tebo Regency Plantation Office-Dinas Perkebunan through letter No.525/395/Disbun/2016, November 28, 2016. Mediation also held with Mitra Serumpun Farmer Group (Community), PT Rigunas Agri Utama, the Police, the Indonesian National Armed Forces and the National Land Agency (BPN) on August 13, 2019 with the agenda of discussing conflicts over alleged overlapping HGU owned by PT RAU with Ownership Rights. Responses to the results of mediation on 13 August 2019: <ul style="list-style-type: none"> ✓ That PT RAU is still a legal HGU certificate holder, so we will continue to carry out management of oil palm plants in the HGU area, so that there will be no damage to the plant and neglect of HGU land because until now there is no legal process running on PT RAU's HGU area. ✓ That PT RAU hopes that the law enforcement agency will be able to maintain the conduciveness of community disturbances that intend to seize, harvest or obstruct PT RAU's plantation activities. ✓ That the Land Office requested that PT RAU immediately proceed with the State Administrative Court (Pengadilan Tata Usaha Negara: PTUN), for this reason it was requested to provide a list of subjects that we had to sue to the PTUN which according to the BPN Office had been issued in the

	<p>PT RAU HGU.</p> <p>Audit Team Findings:</p> <ul style="list-style-type: none"> • PT RAU routinely submit the reports of LPUP to relevant agencies. • PT RAU shows evidence of efforts to resolve land dispute cases and has reported it to BPN Kab. Tebo • However, until this surveillance was carried out, there was no clarity about the exact location of the disputed land based on the Land Office Tebo Regency (BPN). It will be verified in nest audits to see the progress
<p>3</p>	<p>Feedbacks: Dinas Lingkungan Hidup Kab. Batang Hari (Environmental Agency of Batang Hari Regency) Bpk. Deriansyah, S.T, M.S (Kabud. PPKLH)</p> <ul style="list-style-type: none"> • PT Rigunas Agri Utama has a complete environmental permit and is currently still valid. For example LA and LB3 permits. • The company actively submits routine reports, for example RKL / RPL every semester. • The Environmental Service actively visits PT Rigunas Agri Utama's company for PMKS and gardens • There was a complaint from the NGOs Lembaga Pemantau, Penyelamat Lingkungan Hidup of Tebo Regency, by sending letter No. 14/LP2LH-TEBO/SOMASI/VII/2019 on July 29, 2019 to PT Rigunas Agri Utama management's. <p>Management Responses:</p> <ul style="list-style-type: none"> • Environmental licensing is fulfilled by companies in accordance with environmental regulations • Regular environmental reports are reported to the Department of the Environment starting from Tebo Regency, Jambi Province, PPE Sumatra and the Ministry of Environment. • Guidance and Supervision by the Department of the Environment are routinely carried out, until August 2019 there were 3 visits <p>Complaints from NGO Lembaga Pemantau, Penyelamat Lingkungan Hidup (LP2LH) of Tebo Regency:</p> <p>1) Based on letter No. 14/LP2LH-TEBO/SOMASI/VII/2019 from NGOs Lembaga Pemantau, Penyelamat Lingkungan Hidup of Tebo Regency on July 29, 2019 addressed to PT RAU and CC to the Minister of KLHK RI Jakarta, Keagang RI Jakarta, Kejaksaan Negeri Kab. Tebo and DPP LP2LH subject: Somasi/ warning against the alleged disposal of PT RAU Factory waste to environmental media. This allegation after the observation of the report on 28 July 2019, produced:</p> <ul style="list-style-type: none"> - In the replanting area found a broken water underpass pipe which was caused by replanting activity using heavy equipment. - In carrying out stacking activities, we (NGOs) are of the opinion that PT RAU does not pay attention to environmental preservation norms where we see the flow of the "Lauan River" much being buried for planting purposes - There are still many found palm oil planted that is not in accordance with the border of the river / riparian. - As a result of the alleged environmental pollution, we found that there were already victims from several communities in Tanjung Village and Tuo Sumay Village, Sumay Subdistrict, Tebo District who were affected by "itching" after using Batang Sumay river water for bathing. - The condition of the main road in the village is dusty, making it difficult and difficult to breathe, PT RAU should be obliged to "watering" the road but it does not implemented. <p>2) Furthermore, PT Rigunas Agri Utama conveyed this to the Tebo District Environmental Agency (DLH) on July 29, 2019. Representatives from DLH District. Tebo checked the field and took samples of water that were suspected to be polluted by factory waste on August 21, 2019 totaling 5 water samples with locations on the Rotan River, Salak Sengkilan River, factory washing drainage, Block B19A trench water, non-LA well water and well water monitor LA (sumur pantau) for a laboratory check of the</p>

	<p>sample.</p> <p>3) Due to the somasi/warning from the NGOs LP2LH on July 29, 2019 above, a mediation was held between the LP2LH and PT Rigunas Agri Utama on September 11, 2019, with the mediation results recorded in the Minutes of the LP2LH of Tebo Regency with PT Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> - From the results of laboratory tests, it shows that samples that are suspected of being polluted by factory waste, are not proven because the characteristics of the samples tested with factory waste are very different. - Some of the sample test results exceed the TSS and COD quality standards due to replanting activities - PT RAU company will make an effort by planting legume cover crop to overcome TSS and COD problems that exceed quality standards. - NGOs LP2LH asked PT RAU to pay attention to complaints from the community surrounding the company's activities - Both parties accept the results of mediation facilitated by the Tebo Regency Environmental Agency and will not demand one another in any form. <p>Both parties between PT Rigunas Agri Utama and the NGOs LP2LH Tebo Regency agreed the minutes of the mediation results.</p> <p>Audit Team Findings:</p> <ul style="list-style-type: none"> • PT RAU has an ANDAL (Environmental Impact Assessment) document & RKL-RPL - PIR-TRANS oil palm plantation and Palm Oil Processing Plant. • Semester I RKL / RPL (January -June) 2019 has been reported to the relevant institutions. The results of environmental testing has already included on RKL/RPL report. • PT Rigunas Agri Utama should pay more attention to the environmental impacts caused around the plantations.
<p>6</p>	<p>Feedbacks: NGO/LSM Komisi Pencari Fakta</p> <ul style="list-style-type: none"> - It was confirmed that There was a complaint from the NGOs Lembaga Pemantau, Penyelamat Lingkungan Hidup of Tebo Regency, by sending letter No. 14/LP2LH-TEBO/SOMASI/VII/2019 on July 29, 2019 to PT Rigunas Agri Utama management's. - A mediation was held between the LP2LH and PT Rigunas Agri Utama on September 11, 2019, with the mediation results recorded in the Minutes of the LP2LH of Tebo Regency with PT Rigunas Agri Utama. From the results of laboratory tests, it shows that samples that are suspected of being polluted by factory waste, are not proven because the characteristics of the samples tested with factory waste are very different. <p>Management Responses:</p> <p>PT Rigunas Agri Utama conveyed this to the Tebo District Environmental Agency (DLH) on July 29, 2019. Representatives from DLH District. Tebo checked the field and took samples of water that were suspected to be polluted by factory waste on August 21, 2019 totaling 5 water samples with locations on the Rotan River, Salak Sengkilan River, factory washing drainage, Block B19A trench water, non-LA well water and well water monitor LA (sumur pantau) for a laboratory check of the sample.</p> <p>Due to the somasi/warning from the NGOs LP2LH on July 29, 2019 above, a mediation was held between the LP2LH and PT Rigunas Agri Utama on September 11, 2019, with the mediation results recorded in the Minutes of the LP2LH of Tebo Regency with PT Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> - From the results of laboratory tests, it shows that samples that are suspected of being polluted by factory waste, are not proven because the characteristics of the samples tested with factory waste are very different. - Some of the sample test results exceed the TSS and COD quality standards due to replanting

	<p>activities</p> <ul style="list-style-type: none"> - PT RAU company will make an effort by planting legume cover crop to overcome TSS and COD problems that exceed quality standards. - NGOs LP2LH asked PT RAU to pay attention to complaints from the community surrounding the company's activities - Both parties accept the results of mediation facilitated by the Tebo Regency Environmental Agency and will not demand one another in any form. <p>Both parties between PT Rigunas Agri Utama and the NGOs LP2LH Tebo Regency agreed the minutes of the mediation results.</p>
	<p>Audit Team Findings: PT Rigunas Agri Utama should pay more attentions to the environmental impacts caused around the plantations.</p>
<p>7</p>	<p>Feedbacks: Head of Teriti and Muaro Sekalo Village – Kepala Desa Bpk. Suherman (Ds. Muaro Sekalo) Bpk. Rd. Sopli (Ds. Teriti)</p> <ul style="list-style-type: none"> • Positive benefits of the existence of the company PT Rigunas Agri Utama: improving the community's economy, being able to work in the company. Oil palm farmers in the surrounding community can sell palm fruit to the Bungo Tebo PMKS. • There are no environmental complaints from the community. • Every year the company provides assistance to the community, for example in 2018 the construction of Posyandu, construction of wells and cheap food for the poor. • The community still preserves the local culture of "kompangan", which is a musical art activity that is performed during festivity/party. <p>Management Responses:</p> <ul style="list-style-type: none"> • The company opens opportunities to work by prioritizing the surrounding community • The company fosters the economy of the community through plasma builders • There are no community environmental complaints. • CSR of PT. Rigunas Agri Utama is programmed every year for Tuo Sumay and Muaro Sekalo Villages after consultation with the Village Head • The company has assisted in the procurement of partner equipment in 2018 and 2019 to the villages of Muaro Sekalo and Teriti. <p>Audit Team Comment:</p> <ul style="list-style-type: none"> • The company has established a plasma plantation for the village around the plantation (18 KUD). The company has built the Fire Free Village institution in 2018. The company PT Rigunas Agri Utama awards Rp. 100 million per village to villages in which there is no land or forest fire within a year. This program is the initial stage for 5 (five) villages, namely Tuo Sumay, Teriti, Suo-Suo, Muaro Sekalo and Semambu villages.
<p>8</p>	<p>Feedbacks: Gender Committee of PT Rigunas Agri Utama – Bungo Tebo POM</p> <ul style="list-style-type: none"> - The Member of the Gender Committee at PT. Rigunas Agri Utama – Bungo Tebo POM received support from management. Facilities and infrastructure for activities have been completed by company;

	<ul style="list-style-type: none"> - Gender committees routinely carry out activities, including pregnancy tests, HIV / AIDS counseling, cervical cancer counseling, and anti-drug socialization; - There are no reports / findings / indications of sexual harassment; - There are no reports / findings / indications of violations of reproductive rights. The committee secretary acknowledged that having the time to breastfeed a child while working <p>Management Responses: PT. Rigunas Agri Utama – Bungo Tebo POM has commitment to prevent the sexual harassment and support the Committee gender and provide the facility to performed their work program.</p> <p>Audit Team Findings: There is no sexual harassment issue and committee gender has formed by company and has the work programme implemented.</p>
9	<p>Feedbacks: Worker Union of PT. Rigunas Agri Utama – Bungo Tebo POM</p> <ul style="list-style-type: none"> - The Companies and trade unions are respect each other's existence; - Communication is going well, Union meetings are held to discuss the labor issue; - Discussion on the Collective Labor Agreement is underway, to renew the 2015-2017 Collective Labor Agreement which is still being used; - Discussions on the proportion of casual workers are being held with management; - There are no reports / findings / indications of environmental pollution by the company; - There are no reports / findings / indications of discrimination of workers and / or forced labor and / or the use of underage workers; <p>Management Responses: PT Rigunas Agri Utama – Bungo Tebo POM has commitment to comply the labor regulation (UU No. 13 tahun 2003) and give the freedom to workers to have the union and support the trade union to fix the employment issue.</p> <p>Audit Team Findings: Ther is no issue regarding the industrial relation between workers and company. Worker union has run their role as a representative of all workers aspiration. Regular meeting has been performed to discuss the employment issue.</p>

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 PT. Rigunas Agri Utama – Bungo Tebo POM has complied with the RSPO P&C Indonesia National Interpretation, September 2016 and 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 PT. Rigunas Agri Utama – Bungo Tebo POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Ghryate Yonata Aksa
Company Name: on behalf BSI Malaysia Services Sdn Bhd.,	Company Name: PT Rigunas Agri Utama – Bungo Tebo POM
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: 
Date: 9 December 2019	Date: 10 December 2019

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Commitment to Transparency		
Criterion 1.1: 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 List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available. - Minor compliance -	Bungo Tebo POM and Estate: PT. Rigunas Agri Utama has a "Standard Operating Procedure Penanganan Permintaan Informasi Stakeholder No.SOP AA-GL-5008.1-R1" effective date 22/08/2011. The procedure lines out that initial response will be given within 14 working days. Information request will then recorded into logbook by public relation officer. After fulfilment the records of information request will be kept for 3 years. List of information that can be accessed by relevant stakeholders available under "Daftar Dokumen dan Informasi untuk Diakses Publik PT Rigunas Agri Utama", last review on 10 September 2019, there are 27 type of documents, such as: 1. AMDAL 2. Laporan RKL-RPL 3. Social Impact Assessment 4. HCV Identification 5. Perizinan lahan (Izin lokasi, izin prinsip, IPKH, Sertifikat HGU) 6. IMB 7. Perizinan Mesin-Mesin Pabrik 8. Laporan Pelaksanaan P2K3 9. LPUP (Laporan Perkembangan Usaha Perkebunan) PT Rigunas Agri Utama both of Inti and Plasma 10. Document of Conservation of Management Plan 11. Environmental Management Plan	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>12. Document of CSR 13. Papan Harga TBS 14. LKPM 15. Laporan KAHUTLA 16. Report of Water Surface 17. Log book Keluhan/grievance 18. Izin Badan Usaha 19. Company Policy 20. Continous Improvement Program 21. Document of SOP 22. Report of handing of hazardous waste 23. Report of land application 24. Laporan wajib tenaga kerja 25. Report of MCU 26. Laporan Proses Musyawarah dan Hasil Kompensasi Ganti Rugi Lahan 27. Public Summary Report dari Lembaga Sertifikasi</p> <p>List of Stakeholders, updated in January 2019, e.g:</p> <ul style="list-style-type: none"> - Government: Bupati Tebo; DPRD Tebo; Dinas Perkebunan, Peternakan dan Perikanan; Dinas Koperasi, Perdagangan, Perindustrian dan Tenaga Kerja, Dinas Lingkungan Hidup, BPJS Kesehatan Cabang Tebo, BPJS Kenetagakerjaan, Badan Pertanahan Nasional Tebo - Masyarakat: Camat Serai Serumpun, Camat Sumay, Kapolsek Serai Serumpun, Kapolsek Sumay, Danramil Tebo Tengah, Danramil Tebo Ulu, Babinsa Desa tuo Sumay, Puskesmas Sumay, Puskesmas seari Serumpun, Lembaga Adat Tuo Sumay, Kades SP1-SP7, Kades Dusun tuo, Kades Teriti, Kades Kandang, SPSI PT RAU 	

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - KOPERASI-Smalholder: KOPERASI Sawit Sumay Makmur, KOPERASI Sawit Makmur, KOPERASI Sawit Makmur Bersama, etc. (there are 18 KOPERASI) - NGO: Sawit Watch, Serikat Petani Kelapa Sawit, WWF for Nature, World AgroforestryCentre (ICRAF), Environmental Services Program <p>Scheme smallholders</p> <p>The list of information that can be access by relevant stakeholders in cooperative/KUD available under "List Dokumen dan Informasi untuk Diakses Publik Koperasi Unit Sawit Sumay Makmur" and "List Dokumen dan Informasi untuk Diakses Publik Koperasi Unit Barokah" revised in January 2019, such as:</p> <ol style="list-style-type: none"> 1. "AMDAL" – Environmental-social Impact Assessment; 2. "Laporan RKL-RPL" – Environmental Management and Monitoring Plan; 3. "Akte Pendirian Koperasi" – Cooperative establishment deeds; 4. Social Impact Assessment; 5. "Buku RAT" – Annual cooperative meeting records; 6. "Identifikasi HCV" – HCV identification; 7. "Sertifikat tanah (SHM)" – smallholder land certificate; 8. "SOP agronomi" – Standard Operating Procedure for Agronomy ; 9. "IMB" – Building permit; 10. "Pelaksanaan K3" – health and safety policy and implementation; 11. "Dokumen CSR" – Cooperative Social Responsibility document; 12. "Pajak dan restribusi" – tax and retribution record; 13. "Kebijakan Koperasi" – Cooperative Policy Book; 14. Public Summary Report from Certification Body; 15. "Identifikasi dan Pengurangan Sumber Polusi" – Identification of pollution source and Pollution reduction plan; 	

Criterion / Indicator	Assessment Findings	Compliance
	16. "Logbook Keluhan" – Complaint logbook; 17. "Mekanisme penanganan konflik area plasma" – Mechanism for conflict resolution in smallholder area; 18. "Mekanisme keluhan, konsultasi dan komunikasi" – Mechanism for complaint, consultation and communication; 19. "Program Perbaikan Terus-menerus" – Continuous improvement program;	
1.1.2 Records of requests for information and responses to the information requested shall be available. - Major compliance -	Bungo Tebo POM and Estate: PT Rigunas Agri Utama has prepared a register of information request and responses to those information request under record called "Logbook Permintaan Informasi dan Respon Terhadap Permintaan Informasi PT. Rigunas Agri Utama Tahun 2018". For period January – September 2019, the register was recorded 28 information required and it's responses (to date September 2019), such as: <ul style="list-style-type: none"> - Information inquiry – "Dinas Lingkungan Hidup Tebo Regency", dated 14 October 2019. The information request is consist Hazardous Waste Report for 3rd quarter lap 2019 and has responded on 14 October 2019 by send the Report on 15 October 2019. - Data inquiry – from Environment Agency in Tebo Regency related to Report of Environmental Management Plan in January-June 2019". PT RAU has reported the document on 12th August 2019. - Information required – from Agricultural Agency in Tebo Regency related to "Laporan Perkembangan Usaha Perkebunan" for 1st Semester 2019. PT RAU has responded by Group Manager on 10th October 2019. - Request for information from Satuan BRIMOB Tebo Regency on 4 September 2019 letter no. SPRIN/211/IX/2019/SATBM related proposal for assistance for security personal and has responded on 20 September 2019 by sending 4 security personal. - Request for information from BPJS-Kesehatan office in Tebo Regency on 8 October 2019 letter no. 1642/II-07/1019 related invitation for compliance checks and has been responded on 9 October 2019. 	Comply

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Scheme smallholders:</p> <p>Cooperative have recorded the information request and their response in Logbook.</p> <p>KUD Barokah: recorded 5 information requests in 2019, all have been responded. On 17 January 2019, Amri (smallholder) asking the fertilizer price for year 2019; responded by cooperative on 18 January 2019 stating cooperative will ask on the price to PT. Rigunas Agri Utama.</p> <p>KUD Sawit Tanduk Perkasa recorded 3 information requests in 2019, all have been responded. On 16 August 2019, Nurcamid (smallholder) asking if the POM opens on Sunday; Information request being conveyed to PT. Rigunas Agri Utama on same date – the response was the POM will be closed on Sunday.</p> <p>Koperasi Unit Desa Sawit Keluarga Sejahtera recorded 9 information in 2019 and 3 information requests in 2019, all have been responded. On 13 May 2019, Muhtar HS (smallholder) asking the current FFB price; Information request being conveyed to PT. Rigunas Agri Utama on same date – the response was FFB price at the day Rp. 1,292.49/kg for oil palm aged 21-25 years.</p> <p>KUD Sawit Sumay Makmur recorded 12 information requests in 2018 and 8 information requests in 2019, all have been responded. On 14 January 2019, Lasimin (contractor) asking the requirement to become FFB transport contractor; Information responded the requirement (from PT. Rigunas Agri Utama) was application letter, ID card, driving license, vehicle ID, and will be registered into POM's database.</p>	
<p>Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			
1.2.1	Publicly available documents shall include, but are not necessarily limited to: a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact	<p>Bungo Tebo POM and Estate:</p> <p>Publicly available documents available under “Daftar Dokumen dan Informasi untuk Diakses Publik PT. Rigunas Agri Utama 2019”, was updated on 10th October 2019 there are 17 publicly available document such as:</p> <ul style="list-style-type: none"> a. AMDAL, Laporan RKL-RPL, Social Impact Assessment, Dokumen Corporate Social Responsibility - Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) b. Perizinan Lahan (Izin Lokasi, Izin Prinsip, Izin Pelepasan Kawasan Hutan, HGU)- Land titles/user 	Comply

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Criterion / Indicator	Assessment Findings	Compliance
<p>assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</p> <p>d) HCV documentation (Criteria 5.2 and 7.3)</p> <p>e) Pollution prevention and reduction plans (Criterion 5.6)</p> <p>f) Details of complaints and grievances (Criterion 6.3)</p> <p>g) Negotiation procedures (Criterion 6.4)</p> <p>h) Continual improvement plans (Criterion 8.1)</p> <p>i) Public summary of certification assessment report</p> <p>j) Human Rights Policy (Criterion 6.13).</p> <p>- Major Compliance -</p>	<p>rights (Criterion 2.2)</p> <p>c. Dokumen K3 - Occupational health and safety plans (Criterion 4.7)</p> <p>d. Identifikasi HCV dan Lapoan JCV - HCV documentation (Criteria 5.2 and 7.3)</p> <p>e. Program Management Lingkungan, Continuous Improvement Program - Pollution prevention and reduction plans (Criterion 5.6)</p> <p>f. Rekaman Proses Musyawarah dan Hasil Kompensasi Ganti Rugi - Details of complaints and grievances (Criterion 6.3);</p> <p>g. Standard Operating Procedure Social (Penanganan Informasi, Keluhan, Konflik Lahan, dll) - Negotiation procedures (Criterion 6.4)</p> <p>h. Continuous Improvement Program - Continual improvement plans (Criterion 8.1)</p> <p>i. Public summary report dari Lembaga Sertifikasi - Public summary of certification assessment report</p> <p>j. Kebijakan Perusahaan - Human Rights Policy (Criterion 6.13)</p> <p>k. IMB (izin mendirikan bangunan)</p> <p>l. Izin izin pabrik</p> <p>m. FFB price in Papan Harga TBS</p> <p>n. Laporan Pemakaian Air Permukaan</p> <p>o. Wajib lapor tenaga kerja</p> <p>p. Laporan analisa fisik dan kimia air sungai</p> <p>Scheme smallholders:</p> <p>The list of information that can be access by relevant stakeholders in cooperative/KUD available under "List Dokumen dan Informasi untuk Diakses Publik Koperasi Unit Sawit Sumay Makmur" and "List Dokumen dan Informasi untuk Diakses Publik Koperasi Unit Barokah" revised in January 2019, such as:</p> <p>a. "AMDAL" – Environmental-social Impact Assessment;</p> <p>b. "Laporan RKL-RPL" – Environmental Management and Monitoring Plan;</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> c. "Akte Pendirian Koperasi" – Cooperative establishment deeds; d. Social Impact Assessment; e. "Buku RAT" – Annual cooperative meeting records; f. "Identifikasi HCV" – HCV identification; g. "Sertifikat tanah (SHM)" – smallholder land certificate; h. "SOP agronomi" – Standard Operating Procedure for Agronomy; i. "IMB" – Building permit; j. "Pelaksanaan K3" – health and safety policy and implementation; k. "Dokumen CSR" – Cooperative Social Responsibility document; l. "Pajak dan restribusi" – tax and retribution record; m. "Kebijakan Koperasi" – Cooperative Policy Book; n. Public Summary Report from Certification Body; o. "Identifikasi dan Pengurangan Sumber Polusi" – Identification of pollution source and Pollution reduction plan; p. "Logbook Keluhan" – Complaint logbook; q. "Mekanisme penanganan konflik area plasma" – Mechanism for conflict resolution in smallholder area; r. "Mekanisme keluhan, konsultasi dan komunikasi" – Mechanism for complaint, consultation and communication; s. "Program Perbaikan Terus-menerus" – Continuous improvement program. 	
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p>	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all</p> <p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama – Bungo Tebo POM has prepared a written policy to committing to a code of ethical conduct and integrity in all operation and transactions though Company Policy - "Kebijakan</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p>	<p>Perusahaan”, signed by Managing Director on 1st December 2014. The policy mentioned company’s commitment to uphold and respect code of ethical conduct in all operation. The commitment including prevention of corruption, collusion and nepotism.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>Scheme Smallholder:</p> <p>Koperasi Barokah have “Kebijakan Koperasi Barokah” signed on 7 January 2018; the policy stipulates “Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumberdaya” – committed to perform business ethics in all transaction and business operation, prohibit all form of corruption, bribery and fraud in use of financial and resources.</p> <p>KUD Sawit Tanduk Perkasa have “Kebijakan KUD Sawit Tanduk Perkasa” signed on 8 January 2018; in point 2 stating “Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumberdaya” – committed to perform business ethics in all transaction and business operation, prohibit all form of corruption, bribery and fraud in use of financial and resources.</p> <p>KUD Sawit Sumay Makmur have “Kebijakan KUD Sawit Sumay Makmur” signed on 8 January 2018; in point 2 stating “Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumberdaya” – committed to perform business ethics in all transaction and business operation, prohibit all form of corruption, bribery and fraud in use of financial and resources.</p> <p>KUD Sawit Keluarga Sejahtera have “Kebijakan KUD Sawit Keluarga Sejahtera” signed on 8 January 2018; in point 2 stating “Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumberdaya” – committed to perform business ethics in all transaction and business operation, prohibit all form of corruption, bribery and fraud in use of financial and resources.</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>The policy has been communicated to smallholder farmer/member , e.g:</p> <ul style="list-style-type: none"> - In Koperasi Unit Desa Sawit Keluarga Sejahtera, has conducted communication of code of ethical conduct policy on 8 March 2019, was attended by 10 smallholders, including the treasurer and representative from <i>Hamparan 52, 53.</i> - In Koperasi Unit Desa Sawit Tanduk Perkasa, has conducted communication of code of ethical conduct policy on 8 March 2019, was attended by 16 smallholders, representative from <i>Hamparan 54, 55, 56, 60, 64, 69, 95, 96.</i> 	
Principle 2: Compliance with applicable laws and regulations		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance –</p>	<p>Bungo Tebo POM and Estate: The Certificate Holder have provide the documented evidence related legal compliance on land tenure namely "Hak Guna Usaha" or Land Use Permit and Plantation permit as per required within the certification scope. Land use right of PT Rigunas Agri Utama issued by National Land Board. There are two period regarding issuance of land tenure, in 1996 and 2016:</p> <ol style="list-style-type: none"> 3. Decree Letter "SK Menteri Agraria Kepala Badan Pertanahan Nasional No: 51/HGU/BPN/96", dated 27 Nopember 1996. Size area of HGU was 4,388.60 Ha. 4. Certificate of HGU No. 1 Tuo Sumay Village, dated 1 May 1997. Area: 2,070 Ha become 1,604.3 Ha. Valid until 1 May 2032. (Reduction area 465.70 Ha in 2002 for scheme smallholder). 5. Certificate of HGU No. 1 Sungai Rambai Village, dated 1 May 1997. Covering area: 1,047.354 Ha. Valid until 1 May 2032. (Reduction area from 2,318.5 Ha to 1,047.354 Ha). Former Land Use Right or "HGU" issued in 1996 is 2,651.654 Ha. 6. Decree Letter "SK Kepala Kantor Wilayah BPN Prov. Jambi No: 03/HGU/BPN.15/2016", dated 5 August 2016. Size area of HGU 715.63 Ha. <ul style="list-style-type: none"> • Certificate of HGU No. 39 Tuo Sumay Village, dated 19 August 2016. Area: 133.71 Ha. 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Valid until 5 August 2046.</p> <ul style="list-style-type: none"> • Certificate of HGU No. 40 Teluk Singkawang Village, dated 19 August 2016. Area: 108.06 Ha. Valid until 5 August 2046. • Certificate of HGU No. 41 Tuo Sumay Village, dated 19 August 2016. Area: 103.97 Ha. Valid until 5 August 2046. • Certificate of HGU No. 42 Tuo Sumay Village, dated 19 August 2016. Area: 74.14 Ha. Valid until 5 August 2046. • Certificate of HGU No. 43 Tuo Sumay Village, dated 19 August 2016. Area: 134.02 Ha. Valid until 5 August 2046. • Certificate of HGU No. 44 Pinang Belai Village, dated 19 August 2016. Area: 161.73 Ha. Valid until 5 August 2046. <p>Total additional land use right issued in 2016 is 715.63 Ha.</p> <p>Currently, total land use right of own estate (Bungo Tebo Estate and Mill) is 3,367.28 Ha. However, total managed and certified area until ASA-4 is only 2,651.65 Ha.</p> <p>Local community occupies the rest of its area and those areas is unable to manage by the company.</p> <p>Plantation Permit (IUP) of PT Rigunas Agri Utama: "Surat Pendaftaran Usaha Perkebunan" Nomor: 87/Mentanhut-VII/2000, dated 9 October 2000. Hectares: 4,388.5 Ha with capacity POM is 60 MT/Hr.</p> <p>Permit and license for POM's machinery, including the inspection:</p> <p><u>Bungo Tebo Mill:</u></p> <ol style="list-style-type: none"> 7. "Akte Izin No.05/KU/2007 untuk Ketel uap Vickers Hoskins 22.5 kg/cm² PT. Rigunas Agri Utama" – permit for boiler, dated 18 June 2007. Latest inspection by PJK3 Jambi, dated 28-29 May 2019. 8. "Izin/Pengesahan Pemakaian Turbin Uap No.001/566/TU/2015 untuk Turbin Shinko Ind. Ltd. S/N.605768-1" – license for turbine, dated 5 October 2015. Latest inspection by PJK3 Jambi, dated 28-29 May 2019. 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>9. "Izin/Pengesahan Pemakaian Turbin Uap No.05/TU/2007 untuk Turbin Deesser rmd. S/N.5979" – license for turbine, dated 8 June 2007. Latest inspection by PJK3 Jambi, dated 28-29 May 2019.</p> <p>10. "Akte Izin No.02/566/KU/2015 untuk ketel uap" license for steam vessel, dated 1 October 2015. Last inspection 29 May 2019.</p> <p>11. "Izin/Pengesahan Pemakaian Motor Diesel Pembangkit Tenaga Listrik No.08/MD/VI/2007 untuk Genset Cummins S/N.602040" license for turbine, dated 8 June 2007. Latest inspection by PJK3 Jambi, dated 28-29 May 2019.</p> <p>12. "Akte Izin No.01/566/RU/2015 untuk Sterilizer III" – license for sterilizer No.3, dated 1 October 2015. Last inspection 29 May 2019.</p> <p>13. "Akte Izin No.12/BU/2007 untuk Sterilizer II" – license for sterilizer No.2, dated 12 July 2007. Last inspection 29 May 2019.</p> <p>14. "Akte Izin No.13/BU/2007 untuk Sterilizer I" – license for sterilizer No.1, dated 12 July 2007. Last inspection 29 May 2019..</p> <p>15. "Akte Izin No.11/BU/2007 untuk Back Pressure Vessel" – license for back pressure vessel, dated 12 July 2007. Last inspection 29 May 2019.</p> <p>16. "Izin Pemakaian Steam Separator No.01/566/SS/2015 untuk Steam Sepatator" – license for steam separator, dated 5 October 2015. Last inspection 29 May 2019.</p> <p>17. "Izin/Pengesahan Penggunaan Instalasi Listrik di Tempat Kerja No.04/IL/2007 PT. Rigunas Agri Utama" – license for electrical installation, 8 June 2007. Last inspection 28 May 2019.</p> <p>18. "Pengesahan Pemakaian Instalasi Hydran dan Springkler No.560/257A/IHS/PK/IV/2012 PT. Rigunas Agri Utama PMKS Bungo Tebo" – license for hydrant, 24 April 2012. Last inspection 28-29 May 2019.</p> <p>19. "Pengesahan Pemasangan/Pemakaian Instalasi Penyalur Petir di Tempat Kerja No.04/IPP/2007 untuk PT. Rigunas Agri Utama" – license for lightning arrester, 8 June 2007. Last inspection 28-29 May 2019.</p> <p>20. "Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut No.01/566/PA/2016 untuk Wheel</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Loader S/N. F5HPL413D-00222029” – license for wheel loader, dated 20 June 2016. Last inspection dated 28 May 2019.</p> <p>21. “Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut No.560/01/PAA/2014 untuk Ford S/N. 000464F” – license for tractor, dated 29 September 2014. Last inspection 28 May 2019.</p> <p><u>Bungo Tebo estate:</u></p> <p>22. “Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut dan Alat-alat Berat No.560/01/PAA-MG/Sosnakertrans/III/2014 untuk Motor Grader” – for road grader, dated 29 September 2014. Last inspection 28 May 2019.</p> <p>23. “Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut dan Alat-alat Berat No.560/02/PAA-BL/Sosnakertrans/III/2014 untuk backhoe loader” – for backhoe loader, dated 29 September 2014. Last inspection 28 May 2019.</p> <p>24. “Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut dan Alat-alat Berat No.560/244/PAA-C/Sosnakertrans/V/2015 untuk Compactor” – for road compactor, dated May 2018. Last inspection 28 May 2019.</p> <p>Scheme Smallholders:</p> <p>Scheme smallholder PT Rigunas Agri Utama develop based on “Surat Persetujuan Rencana Pembiayaan Proyek PIR (Perkebunan Inti Rakyat) Trans (SPRP3) No. S-32/MK.013/1989” dated 6 Januari 1989 and “Keputusan Gubernur Jambi tentang Pencadangan Tanah untuk PIR Kelapa Sawit No. 90 Tahun 1989” dated 15 Maret 1989 with area 30.000 Ha, and has the forest area release permit according to “Keputusan Menteri Kehutanan No. 771/Kpts-II/1993” 1993 with area 22.710 Ha.</p> <p>1. KOPERASI Tani Mandiri (sample: 21 individual smallholders blocks), village of Kandang.</p> <ul style="list-style-type: none"> - Deed of Cooperative Establishment “Akta Pendirian Koperasi Produksi Tani Mandiri” No: 6, dated 14 April 2014. - Decree letter “SK Kepala Dinas KOPPERINDAG dan PENGELOLAAN PASAR Kab. Tebo”, No: 413.32/BH/KOPPERINDAG & PP/02/2014, dated 8 April 2014 concerning Approval of Deed of 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Cooperative Establishment.</p> <ul style="list-style-type: none"> - Business permit "SIU Perdagangan No: 510/343/SIUP/KPTSP/2015", dated 16 September 2015. - Decree letter "SK Kepala Kantor Pelayanan Terpadu Satu Pintu No: 503/221/ITU/KPTSP/2016", dated 16 September 2016 concerning permit of business place. - Cooperative registration "Tanda Daftar Perusahaan Koperasi No: 05.08.5.52.000550", dated 16 September 2016. Valid until 16 September 2021. <p>2. KOPERASI Tunas Harapan (sample: 19 individual smallholders block), village of Teluk Langkap. Legal standing for smallholders land is based on Regent of Tebo Decree No. 027 Year 2001, dated 29 March 2001 related Determination of Smallholders Land with "PIR-TRANS" System or "Penetapan Petani Peserta PIR Transmigrasi PT Regunas Agri Utama Yang Memperolah Kebun Kelapa Sawit Tanpa Lahan Pekarangan, Perumahan Unit Pemukiman Transmigrasi Kec. Pembantu Sumay dan Kec. Tebo Ulu. Cakupan wilayah antara lain: Kec. Pembantu Sumay (Desa Teluk Langkap, Desa Tambun Arang, Desa Punt Kalo) dan Kec. Tebo Ulu (Desa Bungo Tanjung)". Total smallholders involved: 225 smallholders with consist into nine (9) Blocks or "Hampan 45 upto Hampan 53".</p> <ul style="list-style-type: none"> - Approval of Deed Cooperative Establishment "Pengesahan Akta Perubahan Anggaran Dasar Koperasi Tunas Harapan Nomor: 09/BH/PAD/KOP.UKM/III/07", dated 7 March 2007. Approved by Kantor Koperasi dan UKM Kab. Tebo. - Decree letter "SK Menteri Koperasi, Pengusaha Kecil dan Menengah, Nomor: 87/BH/KDK.5.3/IV/1999", dated 30 April 1999 concerning Approval of Deed Cooperative Establishment. - Business permit "SIU Perdagangan No: 510/152/SIUP/KPTSP/2015", dated 12 June 2015. - Decree letter "SK Kepala Kantor Pelayanan Terpadu Satu Pintu No: 503/178/ITU/KPTSP/2017", dated 10 June 2017 concerning permit of business place. - Cooperative registration "Tanda Daftar Perusahaan Koperasi No: 05.08.2.65.000014", dated 11 June 2014 valid until 11 June 2019. <p>3. KOPERASI Sejahtera Tani (sample: 12 individual smallholders block), village of Punt Kalo.</p>	

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Criterion / Indicator	Assessment Findings	Compliance	
	<ul style="list-style-type: none"> - Deed Cooperative Establishment "Akta Pendirian Koperasi Sejahtera Tani" No: 8, dated 17 November 2014. - Decree letter "SK Kepala Dinas KOPPERINDAG dan PENGELOLAAN PASAR Kab. Tebo, No: 413.32/BH/KOPPERINDAG & PP/02/2014", dated 24 November 2014 concerning Approval of Deed Cooperative Establishment. - Business permit "SIU Perdagangan No: 510/252/SIUP/KPTSP/2015", dated 10 June 2015. - Decree letter "SK Kepala Kantor Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu No: 503/319/ITU/KPMD-PPT/2016", dated 10 June 2016 concerning permit of business place. - Cooperative registration number "Tanda Daftar Perusahaan Koperasi No: 05.08.5.52.000268", dated 10 June 2017. valid until 10 June 2022. <p>4. KOPERASI Tanjung Jaya Bersama (sample: 9 individual smallholders block), village of Tuo Sumay.</p> <ul style="list-style-type: none"> - Decree letter "SK Menteri Negara Koperasi dan UKM RI, Nomor: 47/BH/KOP.UKM/XII/2007, dated 22 December 2007 concerning Approval of Deed Cooperative Establishment. - Business permit "SIU Perdagangan No: 510/311/SIUP/KPTSP/2015", dated 21 August 2015. - Decree letter "SK Kepala Kantor Pelayanan Terpadu Satu Pintu No: 503/353/ITU/KPTSP/2016", dated 21 August 2016 concerning permit of business place. - Cooperative registration number "Tanda Daftar Perusahaan Koperasi No: 05.08.5.52.000568", dated 10 Juni 2017. valid until 10 June 2022. 		
<p>2.1.2</p>	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM, Estate and Smallholders:</p> <p>Written information on legal requirements for Estate and Smallholders are available in "<i>Evaluasi Kepatuhan Hukum</i>". Responsible person for updating legal register onsite is Public Relation and Sustainability Officer, under Law Compliance and Social, Security, License Department.</p> <p>"Daftar Regulasi RSPO dan ISPO, updated on 17 January 2019. Review against latest requirement related to environment, conservation & biodiversity, agriculture, health and safety and manpower regulation, such as:</p> <p><u>Environment regulation:</u></p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Environmental Ministry Regulation "PerMenLh no. 5 Tahun 2018" concerning Standard Competency of PIC of waste water treatment operation and PIC of water pollution control. - Environmental Ministry Regulation "PerMenLh no. 6 Tahun 2018", concerning Standard Competency of air pollution operation and air pollution control. - Environmental Ministry Regulation "PerMenLh No. 8 Tahun 2018", concerning procedure of field inspection of hotspot information/or forest and land fire information. <p><u>Manpower regulation:</u></p> <ul style="list-style-type: none"> - Manpower ministry regulation "Permenaker no. 15 Tahun 2018" concerning minimum wages. - Decree letter of Governor "Keputusan Gubernur Jambi No. 1103/Kep.Gub/Disnakers/2017" Concerning determination of Jambi Province minimum wages 2019. <p><u>Health and safety Regulation:</u></p> <ul style="list-style-type: none"> - Manpower ministry regulation "Permenaker No. 5 Tahun 2018", Concerning Occupational helath and safety, work environment. <p><u>Agricultural regulation:</u></p> <ul style="list-style-type: none"> - Agriculture ministry regulation "Permentan No. 1 Tahun 2018", Concerning Determination of FFB price produce by farmer/smallholder. - Agriculture ministry regulation "Peraturan Menteri Pertanian No 05 Tahun 2018", Concerning Plantation cultivation without burning. - Agraria Minsitry Decree "KepMenATR No. 14 Tahun 2018", concerning location permit. <p>All of the above-mentioned regulation have evaluated on 17 January 2019.</p>	
<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented.</p> <ul style="list-style-type: none"> - Minor compliance – <p>Bungo Tebo POM, Estate and Smallholders:</p> <p>Mechanism for ensuring compliance with legal requirements, the certificate holder using group procedure and it was stated on "Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya (SOP AA-GL-5001.1-R0)", dated 5 December 2009.</p> <p>This mechanism also applied for Smallholders under supervising of Plasma Manager.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.4 A system for tracking any changes in the law shall be available and implemented.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo Estate and Mill:</p> <p>Written information on legal requirements for Estate and Smallholders are available in “<i>Evaluasi Kepatuhan Hukum</i>”. Responsible person for updating legal register onsite is Public Relation and Sustainability Officer, under Law Compliance and Social, Security, License Department.</p> <p>The systems used for tracking any changes in laws and regulations is following its procedure “Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya (SOP AA-GL-5001.1-R0)”, dated 5 December 2009.</p> <p>Document of “Evaluasi Kepatuhan Hukum” is the system used for tracking any changes in laws and regulations. Evaluation of compliance with the regulation has updated on 17 January 2019. Updating, for example:</p> <p><u>Environment regulation:</u></p> <ul style="list-style-type: none"> - Environmental Ministry Regulation “PerMenLh no. 5 Tahun 2018” concerning Standard Competency of PIC of waste water treatment operation and PIC of water pollution control. - Environmental Ministry Regulation “PerMenLh no. 6 Tahun 2018”, concerning Standard Competency of air pollution operation and air pollution control. - Environmental Ministry Regulation “PerMenLh No. 8 Tahun 2018”, concerning procedure of field inspection of hotspot information/or forest and land fire information. <p><u>Manpower regulation:</u></p> <ul style="list-style-type: none"> - Manpower ministry regulation “Permenaker no. 15 Tahun 2018” concerning minimum wages. - Decree letter of Governor “Keputusan Gubernur Jambi No. 1103/Kep.Gub/Disnakers/2017” Concerning determination of Jambi Province minimum wages 2019. <p><u>Health and safety Regulation:</u></p> <ul style="list-style-type: none"> - Manpower ministry regulation “Permenaker No. 5 Tahun 2018”, Concerning Occupational helath and safety, work environment. <p><u>Agricultural regulation:</u></p> <ul style="list-style-type: none"> - Agriculture ministry regulation “Permentan No. 1 Tahun 2018”, Concerning Determination of FFB price 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>produce by farmer/smallholder.</p> <ul style="list-style-type: none"> - Agriculture ministry regulation "Peraturan Menteri Pertanian No 05 Tahun 2018", Concerning Plantation cultivation without burning. - Agraria Minsitry Decree "KepMenATR No. 14 Tahun 2018", concerning location permit. <p>Scheme Smallholder: System used for tracking any changes in law and regulations for Smallholders is implemented through "Evaluasi Kepatuhan Hukum KOPERASI Tani Mandiri", updated on 13 February 2018.</p>	
<p>Criterion 2.2: 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.</p>		
<p>2.2.1</p> <p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate and Mill:</p> <p>The certificate holder (PT Rigunas Agri Utama) has had documented of legal ownership in form of Hak Guna Usaha. There are two period of HGU obtained, in 1997 (revised 1999), in 1997 (revised in 1999 and 2002) and 2016. Details of legal ownership as follow:</p> <p>National Land Board Decree issued on November 1996, Land Use Right Certificate issued on May 1997 (re-measurement in 1999):</p> <p>Land use right of PT Rigunas Agri Utama issued by National Land Board. There are two period regarding issuance of land tenure, in 1996 and 2016:</p> <p>I. SK Menteri Agraria Kepala Badan Pertanahan Nasional No: 51/HGU/BPN/96, tertanggal 27 Nopember 1996. Luas yang diberikan hak 4,388.60 Ha.</p> <ul style="list-style-type: none"> ▪ Certificate of HGU No. 1 Desa Tuo Sumai, dated 1 Mayi 1997. Area: 2,070 Ha become 1,604.3 Ha. Valid until 1 May 2032. (Reduction area 465.70 Ha in 2002 for scheme smallholder). ▪ Certificate of HGU No. 1 Desa Sungai Rambai, dated 1 May 1997. Covering area: 1,047.354 Ha. Valid until 1 May 2032. (Reduction area from 2,318.5 Ha to 1,047.354 Ha). <p>Former Land Use Right or "HGU" issued in 1996 is 2,651.654 Ha.</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance														
	<p>II. SK Kepala Kantor Wilayah BPN Prov. Jambi No: 03/HGU/BPN.15/2016, tertanggal 5 Agustus 2016. Luas total yang diberikan hak 715.63 Ha.</p> <ul style="list-style-type: none"> ▪ Certificate of HGU No. 39 Desa Tuo Sumay, dated 19 August 2016. Area: 133.71 Ha. Valid until 5 August 2046. ▪ Certificate of HGU No. 40 Desa Teluk Singkawang, dated 19 August 2016. Area: 108.06 Ha. Valid until 5 August 2046. ▪ Certificate of HGU No. 41 Desa Tuo Sumay, dated 19 August 2016. Area: 103.97 Ha. Valid until 5 August 2046. ▪ Certificate of HGU No. 42 Desa Tuo Sumay, dated 19 August 2016. Area: 74.14 Ha. Valid until 5 August 2046. ▪ Certificate of HGU No. 43 Desa Tuo Sumay, dated 19 August 2016. Area: 134.02 Ha. Valid until 5 August 2046. ▪ Certificate of HGU No. 44 Desa Pinang Belai, dated 19 August 2016. Area: 161.73 Ha. Valid until 5 August 2046. <p>Total additional land use right issued in 2016 is 715.63 Ha.</p> <p>Currently, total land use right of own estate (Bungo Tebo Estate and Mill) is 3,367.28 Ha. However, total managed and certified area until ASA-4 is only 2,651.65 Ha.</p> <p>Local community occupies the rest of its area and those areas is unable to manage by the company.</p> <p>Scheme Smallholder:</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. Based on sampling during ASA-4, the document of legal land ownership of 61 individual smallholders are available and maintain by Scheme Manager (Kantor Plasma). The following legal ownership certificates (SHM; Sertifikat Hak Milik) taken samples in this surveillance 4th audit, among them:</p> <table border="1" data-bbox="663 1362 1536 1388"> <thead> <tr> <th>No.</th> <th>Hamparan</th> <th>Kavling</th> <th>Name</th> <th>SHM No.</th> <th>Year</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No.	Hamparan	Kavling	Name	SHM No.	Year	Area (Ha)								
No.	Hamparan	Kavling	Name	SHM No.	Year	Area (Ha)										

Criterion / Indicator	Assessment Findings						Compliance				
	KUD Sawit Keluarga Sejahter										
	Desa Bungo Tanjung										
	1	52	960	Samsudin	600	2004		1,949			
	2	52	961	Buhari Las	377	2002		20,040			
	3	52	989	H. Solahuddin	368	2002		2,041			
	4	52	990	Zauwiyah	66	2002		2,014			
				Sub Total				26,044			
	KUD Sawit Makmur Bersama										
	Desa Bukit Pamuatan										
	1	75	1635	Ruslan / Yusuf	394	2004			2,007		
	2	75	1640	Jumadi / Sukardi	581	2004			1,976		
	3	76	1490	Saliman /Imam	428	2004			1,938		
	4	76	1491	Satino	429	2004			1,924		
	5	77	1643	Munir / Mujamil	544	2004			1,976		
	6	77	1681	Suparno	579	2004			1,988		
	7	77	1684	Sajim	395	2004			2,069		
	8	77	1580	M. Daud	547	2004			1,937		
	9	77	1590	Dijah Tanjung	542	2004			1,997		
	10	77	1591	Paijo	486	2004			1,947		
	11	79	1529	Mulyadi K.	596	2004			1,991		
	12	79	1530	Marno	434	2004			1,947		
	13	81	1703	Mudriah	485	2004			1,951		
	14	81	1704	Undang Sofian	513	2004			2,284		
				Sub Total					27,932		
	KUD Barokah										
	Desa Teluk Kasai Rambaha										
	1	16	475	Baihaki	947	2002				2,019	
	2	16	485	M. Nasir / Edi	858	2002				2,113	
	3	17	456	Edi Susanto	898	2002				1,929	
	4	17	457	Patmawati / Muhadi	862	2002				2,053	
	5	22	434	Ngadiran	868	2002				2,390	
	6	22	562	Safi'i	862	2002				2,053	
	7	22	668	Jumianto / Madi	899	2002				1,929	
	8	22	669	M. Kasim K.	854	2002				2,219	
				Sub Total						16,705	
	KUD Sawit Tanduk Perkasa										
	Desa Sako Makmur										
	1	54	1454	Mahyudin	385	2004					2,264
	2	54	1457	Mardani / Agus	375	2004					2,047
	3	56	1420	Zuhdi Z. / Saman	366	2004					2,079
	4	56	1427	Juri Jubai / Tomi	349	2004					2,048

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Criterion / Indicator		Assessment Findings						Compliance	
		5	56	1429	M. Ali / Iman R.	292	2004	1,835	
		6	56	1437	Ira AN / Sugianto	293	2004	2,337	
		7	58	1360	Tarmizi Has / Suprat	320	2004	2,036	
		8	58	1361	Makmun RTL / Latipah	391	2004	2,000	
		9	58	1362	Arman Dulika / Nurhamid	304	2004	2,796	
		10	58	1369	Heri / Pariyanto	328	2004	2,029	
		11	58	1375	Bahtiar KC. / Joko	338	2004	2,288	
		12	58	1376	Nabhan / Suhaimi	331	2004	2,722	
		13	58	1383	Swandi IT / Suhaimi / Rohman	339	2004	2,281	
		14	71	1298	Sahril / Wediyanto	340	2004	2,277	
		15	71	1299	Habli / Sugeng	342	2004	2,221	
		16	60	1300	Yusuf A. /Sugianto	344	2004	2,157	
		17	69	1275	Sayuti	382	2004	2,074	
		18	69	1276	Amran AL. / Sayuti / Sularno	383	2004	2,264	
					Sub Total			39,755	
		KUD Sawit Sumay Makmur							
		Desa Pinang Balai							
		1	2	328	Mujar	785	2002	1,938	
		2	2	329	Suyud / Dedi	390	1999	1,880	
		3	2	330	Wahyudi /Saroni	380	1999	1,962	
		4	3	278	Marsono / Dedi	383	1999	1,929	
		5	3	279	Kusmanto	410	1999	1,954	
		6	3	280	J. Sinambela	542	1999	2,063	
		7	5	256	Lijah A.	536	1999	2,346	
		8	5	257	Sukadi	691	2000	1,958	
		9	5	258	ABD Muin B	543	1999	2,055	
		10	6	407	Naslikah	434	1999	1,878	
		11	6	408	Karyono	418	2006	1,920	
		12	6	409	Mahidin	772	2002	2,008	
		13	10	125	Suwardi	760	2002	2,246	
		14	10	150	Bedul Fahta	761	2002	2,228	
		15	10	151	Karman	780	2002	1,978	
		16	10	152	Jedawi	783	2002	1,970	
		17	12	68	Jumangan	731	2002	1,942	
		18	12	69	Misnan	345	2002	2,005	
		19	12	70	Rizal Sinaga	1028	2002	1,968	
		20	12	71	Khairul Anom / Heri	712	2002	2,300	
					Sub Total			40,528	
					Total			150,963	

Criterion / Indicator	Assessment Findings	Compliance
<p>2.2.2 Legal boundaries are demonstrated clearly and maintained. - Minor compliance -</p>	<p>Bungo Tebo Estate and Mill: PT Rigunas Agri Utama have legal boundaries map "Peta Patok HGU" Scale 1:86,293. Monitoring checklist on legal boundaries "Laporan Pemeriksaan dan Perawatan Patok Batas" No: 008/SSL/LAP/I/2019 dated 16 July 2019 is available to ensure condition and accurate position of legal boundaries. Coordinate position also available in each legal boundaries within the report. During field observation with sample legal boundaries pegs, all visited boundary pegs are clearly visible and maintained.</p> <ol style="list-style-type: none"> 1. RAU 05³ in Block A16F Afdeling 1, coordinates; 01° 15' 50.96" S; 102° 21' 37.25 E". 2. RAU 03³ in Block A16H Afdeling 1, coordinates; 01° 16' 14.29" S; 102° 21' 46.27 E". 3. RAU 01⁴ in Block A16B Afdeling 1, coordinates; 01° 15' 30.48" S; 102° 22' 13.41 E". <p>Scheme Smallholder :</p> <ol style="list-style-type: none"> 1. Koperasi Sawit Keluarga Sejahtera (sample: 4 individual smallholders blocks), village Bungo Tanjung. Pak H. Solahudin (Farmer Group: 52, plot: 990). Boundary Pole 1: 1° 15' 30.48" S 102° 22' 13.41" E Boundary Pole 2: 1° 13' 22.81" S 102° 19' 32.69" E Boundary Pole 3: 1° 14' 19.23" S 102° 19' 34.2" E Boundary Pole 4: 1° 13' 55.97" S 102° 20' 14.34" E 2. KOPERASI Sawit Makmur Bersama (sample: 14 individual smallholders block), village of Bukit Pamuatan. Pak Undang Sogfian (Farmer Group: 81, plot: 1704). Boundary Pole 1: 1° 13' 56.89" S 102° 20' 11.95" E Boundary Pole 2: 1° 13' 56.60" S 102° 20' 11.92" E 	<p>NC# 1839713-201910-M1 Closed on 13 November 2019 Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Boundary Pole 3: 1° 13' 55.96" S 102° 20' 14.32" E Boundary Pole 4: 1° 13' 55.97" S 102° 20' 14.34" E</p> <p>3. Koperasi Barokah (sample: 8 individual smallholders block), village of Sako Makmur. M. Kasim K. (Farmer Group:22, plot: 669). Boundary Pole 1: 1° 18' 16.66" S 102° 23' 13.73" E Boundary Pole 2: 1° 18' 16.46" S 102° 23' 11.38" E Boundary Pole 3: 1° 18' 23.39" S 102° 23' 14.16" E Boundary Pole 4: 1° 18' 23.57" S 102° 23' 11.16" E</p> <p>4. Koperasi Sawit Tanduk Perkasa (sample: 8 individual smallholders block), village of Sako Makmur. Mahyudin (Farmer Group:54, plot: 1454). Boundary Pole 1: 1° 10' 20.37" S 102° 13' 46.57" E Boundary Pole 2: 1° 11' 18.37" S 102° 14' 43.37" E Boundary Pole 3: 1° 15' 21.26" S 102° 13' 10.25" E Boundary Pole 4: 1° 14' 20.57" S 102° 16' 23.57" E</p> <p>5. Koperasi Sawit Sumay Makmur (sample: 20 individual smallholders block), village of Pinang Balai. Mahyudin (Farmer Group:54, plot: 1454). Boundary Pole 1: 1° 19' 8.21" S 102° 22' 24.27" E Boundary Pole 2: 1° 10' 15.68" S 102° 13' 46.45" E Boundary Pole 3: 1° 10' 15.88" S 102° 13' 48.51" E Boundary Pole 4: 1° 10' 19.96" S 102° 13' 49.12" E</p> <p>Plasma Bungo Tebo perform maintenance pegs of plots regularly every 3 months once, last done:</p> <ul style="list-style-type: none"> ▪ Koperasi Sawit Tanduk Perkasa on 20 agusuts 2019 ▪ Koperasi Sawit Sumay Makmur on October 4, 2019 ▪ Koperasi Sawit Makmur Bersama on October 3, 2019 	

Criterion / Indicator	Assessment Findings	Compliance
<p>2.2.3 In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill:</p> <p>Procedure to resolve land conflict in form of "Standard Operating Procedure (SOP) No.AA- GL-5003.1-R2 related Penanganan Konflik Lahan rev.2" dated 8th May 2015. The SOP has described flow process and mechanism to handle land conflict</p> <p>According to stakeholder consultation, it is informed that in 2016 there were land disputes (overlapping) within the Land Use Right (HGU) of PT Rigunas Agri Utama area, following:</p> <ol style="list-style-type: none"> 1. Local NGO "LSM Pemantau Korupsi dan Penyelamat Harta Negara", Letter No: 002/DPW/PK&PHN/JP/KU/VI/2016, dated June 25, 2016. The letter contains indications that replanting activities of PT RAU are outside the HGU. 2. Local NGO Panglimo Djoenid Kab. Tebo reported to the local police station (Tebo District) with a Letter No: 11/PDJ/TBO/X/16, September 28, 2016. The letter contained reports that several group of local communities had a valid Land Ownership Rights Certificate (SHM) above HGU of PT Rigunas Agri Utama and will carry out oil palm harvesting in the area. <p>All of these problems have been mediated by the Regent of Tebo through Letter No: 005/1347 / Disbun / 2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No: 525/395 / Disbun / 2016, November 28, 2016</p> <p>The results of the meeting concluded that the disputed area would be resolved by law through an inventory of legal aspects where 294 documents issued in 2016 and the PT Rigunas Agri Utama HGU will be collected together. In addition, a participatory field examination will be conducted to ensure that the disputed location can be traced.</p> <p>Based on the results of the Mediation Meeting on November 30, 2016, it was concluded that the implementation of field checks was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Regional Office (Office of the Ministry of Agrarian and Spatial Planning / BPN Jambi Province). The Minutes of Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> 1. Plt. Sekretaris Daerah Kab. Tebo 2. Kepala Kantor Kesbangpol Kab. Tebo 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 3. Kapolsek Serai Serumpun 4. KBO Intelkam Polres Tebo 5. Kabid Bina Usaha Disbun Tebo 6. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo 7. Kasi HT&PT BPN Kab. Tebp 8. Kasi Wasnas Kantor Kesbangpol Kab. Tebo 9. Kasi Rehabilitasi Kantor LH Kab. Tebo 10. Kasi Trantib Kec. Serai Serumpun 11. Staf Dinas Kehutanan Kab. Tebo 12. GM PT RAU 13. Humas PT RAU 14. GIS PT RAU <p>Scheme Smallholder: For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. There is no issue related land dispute between smallholders.</p>	
<p>2.2.4</p>	<p>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.</p> <p>- Major compliance –</p> <p>Bungo Tebo Estate and Mill: Procedure to resolve land conflict in form of “Standard Operating Procedure (SOP) No.AA- GL-5003.1-R2 related Penanganan Konflik Lahan rev.2” dated 8th May 2015. The SOP has described flow process and mechanism to handle land conflict</p> <p>According to stakeholder consultation Mr.Setia from NGO KPFI-KT (Komisi Pencari Fakta Independen Kabupaten Tebo), it is informed that in 2016 there were land disputes (overlapping) within the Land Use Right (HGU) of PT Rigunas Agri Utama area, following:</p> <ol style="list-style-type: none"> 1. Local NGO “LSM Pemantau Korupsi dan Penyelamat Harta Negara”, Letter No: 	<p>Comply</p>

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	<p>002/DPW/PK&PHN/JP/KU/VI/2016, dated June 25, 2016. The letter contains indications that replanting activities of PT RAU are outside the HGU.</p> <p>2. Local NGO Panglimo Djoenid Kab. Tebo reported to the local police station (Tebo District) with a Letter No: 11/PDJ/TBO/X/16, September 28, 2016. The letter contained reports that several group of local communities had a valid Land Ownership Rights Certificate (SHM) above HGU of PT Rigunas Agri Utama and will carry out oil palm harvesting in the area.</p> <p>All of these problems have been mediated by the Regent of Tebo through Letter No: 005/1347/Disbun/2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No: 525/395 / Disbun / 2016, November 28, 2016</p> <p>The results of the meeting concluded that the disputed area would be resolved by law through an inventory of legal aspects where 294 documents issued in 2016 and the PT Rigunas Agri Utama HGU will be collected together. In addition, a participatory field examination will be conducted to ensure that the disputed location can be traced.</p> <p>Based on the results of the Mediation Meeting on November 30, 2016, it was concluded that the implementation of field checks was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Regional Office (Office of the Ministry of Agrarian and Spatial Planning / BPN Jambi Province). The Minutes of Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> 1. Plt. Sekretaris Daerah Kab. Tebo 2. Kepala Kantor Kesbangpol Kab. Tebo 3. Kapolsek Serai Serumpun 4. KBO Intelkam Polres Tebo 5. Kabid Bina Usaha Disbun Tebo 6. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo 7. Kasi HT&PT BPN Kab. Tebo 8. Kasi Wasnas Kantor Kesbangpol Kab. Tebo 9. Kasi Rehabilitasi Kantor LH Kab. Tebo 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>10. Kasi Trantib Kec. Serai Serumpun 11. Staf Dinas Kehutanan Kab. Tebo 12. GM PT RAU 13. Humas PT RAU 14. GIS PT RAU</p> <p>Total area: ± 606 Ha. For example:</p> <ul style="list-style-type: none"> ▪ Rumadi dkk: 263 persil/SHM (± 526 Ha) upon HGU certificate year 1997. Location in Block A94f – A94k, Afd. 1 (Year of Planting 1994), the remain area located in Block D08f, Afd. 4 (Planting Year 2008). ▪ Sayuti cs: 31 persil/SHM (± 80 Ha) upon HGU certificate year 1997 (5 certificate in HGU 2016 area), area located in Block D08a – D08f, Afd. 4 (Planting Year 2008). <p>On August 13, 2019 has been held the mediation that was attended by the farmer Group Mitra Serumpun (community), PT Rigunas Agri Utama, Police Department, Indonesian National Army (TNI) and National Land Agency Tebo Regency (BPN) with the the agenda of discussion of alleged conflicts of HGU that belong to PT RAU with the community's rights (Farmer Group), and the results of mediation are poured in the news of the mediation event, as follows:</p> <ol style="list-style-type: none"> 1. That based on advice and input from the police Resort District Tebo as well as the Indonesian National Army (TNI), that to keep the conduciveness safety and environmental comfort in the location of the dispute object. Asked to PT RAU and the community (Mitra Serumpun Farmer Group) to refrain from doing the accitvitas in the land of the dispute object while awaiting an advanced legal process that has a fixed legal force.. 2. That both parties should refrain from maintaining the security and order of the environment on the ground (object disputes) as well as not doing things that violate the law. 3. That is requested to PT RAU to immediately perform the application process of lawsuit to the Pengadilan Tata Usaha Negara (PTUN). 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>4. That for point (1) above, it is requested to PT RAU to be able to provide an answer no later than 14 (fourteen) days since the letter received.</p> <p>Furthermore, PT Rigunas Agri Utama has provided responses and answers to the results of the mediation above on 15 August 2019 by letter No. 06/LG-RIGUNAS/EXT/VIII/19, containing:</p> <p>Explanation:</p> <ul style="list-style-type: none"> - PT RAU has mastered and cultivated the land of oil palm plantation in the area of Sungai Rambai Village, Tebo Ulu Sub District, Tebo Regency, Prov. Jambi for area 1,047.354 Ha. Referred to the certificate of HGU No. 1, dated May 1, 1997 which given by decree of the Minister of State of Agrarian/head of National Land agency SK Kepala BPN No. 51/HGU/BPN/1996 dated 27 November 1996. - That HGU has been controlled and planted with oil palm since 1996 without any claim or lawsuit from the public or from any party. <p>Answer/response to the mediation results dated 13 August 2019:</p> <ul style="list-style-type: none"> - That PT RAU is still a legitimate HGU holder, so we will continue to maintain and manage the oil palm crops that we have planted in the HGU in order not to cause damage to the plant and the abandoned land of HGU given because until now there is no legal process against the area of HGU PT RAU. - That PT RAU hopes the law enforcement officers can keep conduciveness from the disruption of communities who intend to seize, harvest or obstruct plantation activities of PT RAU. - That the land office asks that PT RAU immediately conduct a lawsuit to the Pengadilan tata Usaha Negara (PTUN), for that please provide a list of objects that we must sue to the PTUN which is according to the office of BPN has overlap in HGU PT RAU. <p>However, until this surveillance is conducted, there is no clarity about the exact location of the disputed land according to the BPN office Tebo Regency.</p> <p>Scheme Smallholder:</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	
<p>2.2.5</p> <p>For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo Estate and Mill:</p> <p>The Certificate Holder has prepared a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Up to this moment, company does not have planning to expand the plantation.</p> <p>Procedure to resolve land conflict against land disputes over the land on Indicator 2.2.4 above, the company has provide the evidence of resolve process with affected stakeholder facilitated by local government.</p> <p>On August 13, 2019 has been held mediation that was attended by the farmer Group Mitra Serumpun (community), PT Rigunas Agri Utama, police, Indonesian National Army (TNI) and National Land Agency (BPN) with the The agenda of discussion of alleged conflicts of HGU that belong to PT RAU with the community's rights (Farmer Group), and the results of mediation are poured in the news of the mediation event, as follows:</p> <ol style="list-style-type: none"> 1. That based on advice and input from the police Resort District Tebo as well as the Indonesian National Army (TNI), that to keep the conduciveness safety and environmental comfort in the location of the dispute object. Asked to PT RAU and the community (Mitra Serumpun Farmer Group) to refrain from doing the accitvitas in the land of the dispute object while awaiting an advanced legal process that has a fixed legal force.. 2. That both parties should refrain from maintaining the security and order of the environment on the ground (object disputes) as well as not doing things that violate the law. 3. That is requested to PT RAU to immediately perform the application process of lawsuit to the Pengadilan Tata Usaha Negara (PTUN). 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>4. That for point (1) above, it is requested to PT RAU to be able to provide an answer no later than 14 (fourteen) days since the letter received.</p> <p>Furthermore, PT Rigunas Agri Utama has provided responses and answers to the results of the mediation above on 15 August 2019 by letter No. 06/LG-RIGUNAS/EXT/VIII/19, containing:</p> <p>Explanation:</p> <ul style="list-style-type: none"> - PT RAU has mastered and cultivated the land of oil palm plantation in the area of Sungai Rambai Village, Tebo Ulu Sub District, Tebo Regency, Prov. Jambi for area 1,047.354 Ha. Referred to the certificate of HGU No. 17 (last certificate No. 1, dated May 1, 1997) which Given by decree of the Minister of State of Agrarian/head of National Land agency No. 51/HGU/BPN/1996 dated 27 November 1996. - That HGU has been controlled and planted with oil palm since 1996 without any claim or lawsuit from the public or from any party. <p>Answer/response to the mediation results dated 13 August 2019:</p> <ul style="list-style-type: none"> - That PT RAU is still a legitimate HGU holder, so we will continue to maintain and manage the oil palm crops that we have planted in the HGU in order not to cause damage to the plant and the abandoned land of HGU given because until now there is no legal process against the area of HGU PT RAU. - That PT RAU hopes the law enforcement officers can keep conduciveness from the disruption of communities who intend to seize, harvest or obstruct plantation activities of PT RAU. - That the land office asks that PT RAU immediately conduct a lawsuit to the Pengadilan tata Usaha Negara (PTUN), for that please provide a list of objects that we must sue to the PTUN which is according to the office of BPN has overlap in HGU PT RAU. <p>However, until this surveillance 4 conducted, there is no clarity about the exact location of the disputed land according to the BPN office Tebo Regency.</p> <p>Smallholder – Bungo Tebo Plasma:</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	
<p>2.2.6</p> <p>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/or planned operations.</p> <p>- Major compliance –</p>	<p>Bungo Tebo Estate and Mill:</p> <p>The Certificate Holder has prepared a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Up to this moment, company does not have planning to expand the plantation.</p> <p>Procedure to resolve land conflict against land disputes over the land on Indicator 2.2.4 above, the company has provide the evidence of resolve process with affected stakeholder facilitated by local government.</p> <p>On August 13, 2019 has been held mediation that was attended by the farmer Group Mitra Serumpun (community), PT Rigunas Agri Utama, police, Indonesian National Army (TNI) and National Land Agency (BPN) with the The agenda of discussion of alleged conflicts of HGU that belong to PT RAU with the community's rights (Farmer Group), and the results of mediation are poured in the news of the mediation event, as follows:</p> <ol style="list-style-type: none"> 1. That based on advice and input from the police Resort District Tebo as well as the Indonesian National Army (TNI), that to keep the conduciveness safety and environmental comfort in the location of the dispute object. Asked to PT RAU and the community (Mitra Serumpun Farmer Group) to refrain from doing the accitvitas in the land of the dispute object while awaiting an advanced legal process that has a fixed legal force. 2. That both parties should refrain from maintaining the security and order of the environment on the ground (object disputes) as well as not doing things that violate the law. 3. That is requested to PT RAU to immediately perform the application process of lawsuit to the Pengadilan Tata Usaha Negara (PTUN). 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>4. That for point (1) above, it is requested to PT RAU to be able to provide an answer no later than 14 (fourteen) days since the letter received.</p> <p>Furthermore, PT Rigunas Agri Utama has provided responses and answers to the results of the mediation above on 15 August 2019 by letter No. 06/LG-RIGUNAS/EXT/VIII/19, containing:</p> <p>Explanation:</p> <ul style="list-style-type: none"> - PT RAU has mastered and cultivated the land of oil palm plantation in the area of Sungai Rambai Village, Tebo Ulu Sub District, Tebo Regency, Prov. Jambi for area 1,047.354 Ha. Referred to the certificate of HGU No. 17 (last certificate No. 1, dated May 1, 1997) which Given by decree of the Minister of State of Agrarian/head of National Land agency No. 51/HGU/BPN/1996 dated 27 November 1996. - That HGU has been controlled and planted with oil palm since 1996 without any claim or lawsuit from the public or from any party. <p>Answer/response to the mediation results dated 13 August 2019:</p> <ul style="list-style-type: none"> - That PT RAU is still a legitimate HGU holder, so we will continue to maintain and manage the oil palm crops that we have planted in the HGU in order not to cause damage to the plant and the abandoned land of HGU given because until now there is no legal process against the area of HGU PT RAU. - That PT RAU hopes the law enforcement officers can keep conduciveness from the disruption of communities who intend to seize, harvest or obstruct plantation activities of PT RAU. - That the land office asks that PT RAU immediately conduct a lawsuit to the Pengadilan tata Usaha Negara (PTUN), for that please provide a list of objects that we must sue to the PTUN which is according to the office of BPN has overlap in HGU PT RAU. <p>However, until this surveillance is conducted, there is no clarity about the exact location of the disputed land according to the BPN office Tebo Regency.</p> <p>Smallholder – Bungo Tebo Plasma:</p>	

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		For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.	
Criterion 2.3:			
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 with 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 neighboring communities where applicable, and relevant authorities). - Major compliance -	<p>Bungo Tebo Estate and Mill</p> <p>For land issue as above mention (Indicator 2.2.3; 2.2.4; 2.2.5), the land conflict area has been mapped "Peta Identifikasi Kepemilikan Lahan" Scale 1:43,082 and Identification of Unable Managed Area "Peta Identifikasi Area yang Tidak dikuasai PT Rigunas Agri Utama – Kebun Bungo Tebo".</p> <p>According to stakeholder consultation contacted during this Surveillance, particularly local government authority (BPN Kabupaten Tebo), there is no customary or indigenous or traditional rights within the company area.</p> <p>Scheme Smallholders:</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on state land. Based on communication with Lembaga Adat Tuo Sumay, the allocated land was not customary.</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p>	Comply
2.3.2	Copies of negotiated agreements including the process of free, prior and informed consent (FPIC)	<p>Bungo Tebo Estate and POM:</p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
<p>(Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <ul style="list-style-type: none"> a) Evidence of consultation b) Statement of transfer of rights c) Evidence of compensation <p>See specific guidance 2.3.2</p> <p>- Minor compliance -</p>	<p>Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo” dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per “Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha” dated 18 November 1993. Land historical is clearly describe in “Risalah Panitia-B” for Land Use Right/HGU 1997 and HGU 2016. There is no land compensation during 2017 to 2019 (up to September 2019).</p> <p>Scheme Smallholders:</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p> <p>There was no land compensation for smallholder to previous landowner. The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on state land by government.</p> <p>However, cooperatives recorded the transaction of land ownership between smallholders. Sample verified: “Surat Keterangan Pengurus KUD Sawit Sumay Makmur tentang Kepemilikan Kapling Hampanan 10, blok No.125 dari pemilik awal Suwardi kepada pemilik baru Budi” – statement from cooperative on land transaction from previous block owner Suwardi to new block owner Budi, dated 11 January 2019.</p> <p>Acknowledge by village administrator “Surat Keterangan Jual-Beli Tanah Kapling Desa Pinang Belai, dari Suwardi to Budi Hampanan 10, blok No.125, SP1” dated 11 January 2019 – signed by village head, current landowner (buyer), previous landowner (seller) and witnesses from surrounding block (north-south-east-west side).</p> <p>“Surat Keterangan Pengurus KUD Sawit Tanduk Perkasa tentang Kepemilikan Kapling Hampanan 56, blok No.1429 dari pemilik awal M. Ali kepada pemilik baru Iman R.” – statement from cooperative on land transaction from previous block owner M. Ali to new block owner Iman R, dated 8 March 2019.</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Acknowledge by village administrator "Surat Keterangan Jual-Beli Tanah Kapling Desa Sako Makmur, dari M. Ali kepada Iman R.; Hamparan 56, blok No.1429, SP7" dated 8 March 2019 – signed by village head, current landowner (buyer), previous landowner (seller) and witnesses from surrounding block (north 1428-south 1427-east 1437-west 1430 side).</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p>	
<p>2.3.3</p> <p>Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill:</p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo" dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per "Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha" dated 18 November 1993. Land historical is clearly describe in "Risalah Panitia-B" for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 – 2019 (up to September 2019).</p> <p>Scheme Smallholders:</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p>	<p>Comply</p>
<p>2.3.4</p> <p>Evidence shall be available to show that communities are represented through institutions or representatives of their own</p>	<p>Bungo Tebo Estate and Mill:</p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR</p>	<p>Comply</p>

Criterion / Indicator		Assessment Findings	Compliance
	<p>choosing, including legal counsel.</p> <p>- Major compliance -</p>	<p>Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo” dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per “Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha” dated 18 November 1993. Land historical is clearly describe in “Risalah Panitia-B” for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 – 2019 (up to September 2019).</p> <p>Scheme Smallholders:</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p>	
<p>Principle 3: Commitment to long-term economic and financial viability</p>			
<p>Criterion 3.1:</p> <p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
<p>3.1.1</p>	<p>A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.</p> <p>- Major compliance-</p>	<p>Bungo Tebo POM and Estate:</p> <p>The company has committed to economic and financial sustainability and has documented the working plan in the Financial Budget Plan “Rencana Kerja Perusahaan”. The company has set up a business management plan for the next 5 years and the forecast have been well documented in the document “Proyeksi Produk Sustainable & Non Sustainable PT Rigunas Agri Utama Group Bungo Tebo” 2020 - 2024. Management plan was set up including independent FFB suppliers. Its management plan include:</p> <ol style="list-style-type: none"> 1. FFB Production projection 2020 - 2024 2. CPO, PK, production projection 2020 - 2024 3. OER, KER projection 2020 - 2024 4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management 	<p>Comply</p>

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	<p>5. cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost.</p> <p>6. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2018 and projection 2020 - 2024</p> <p>7. Nett Profit/Loss</p> <p>Crop Projection Bungo Tebo Estate 2020 - 2024:</p> <table border="1" data-bbox="667 639 1498 986"> <thead> <tr> <th rowspan="2">Year of Planted</th> <th rowspan="2">Ha</th> <th colspan="5">Estimated production (Ton)</th> </tr> <tr> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr><td>1994</td><td>132</td><td>4.140</td><td>156</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>1995</td><td>300</td><td>7.800</td><td>1.488</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>1996</td><td>384</td><td>9.103</td><td>1.747</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>2008</td><td>512</td><td>12.288</td><td>12.852</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>2016</td><td>295</td><td>-</td><td>4.130</td><td>6.490</td><td>7.375</td><td>7.965</td></tr> <tr><td>2017</td><td>449</td><td>-</td><td>-</td><td>6.286</td><td>9.878</td><td>11.225</td></tr> <tr><td>2018</td><td>447</td><td>-</td><td>-</td><td>-</td><td>6.258</td><td>9.834</td></tr> <tr><td>Total</td><td>2.519</td><td>33.331</td><td>20.373</td><td>12.776</td><td>23.511</td><td>29.024</td></tr> </tbody> </table> <p>Estimated production Bungo Tebo POM 2020 – 2024:</p> <table border="1" data-bbox="667 1051 1520 1291"> <thead> <tr> <th rowspan="2">Description</th> <th rowspan="2">UOM</th> <th colspan="5">Estimated Production (Ton)</th> </tr> <tr> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr><td>FFB Processed</td><td>Ton</td><td>271.040</td><td>265.718</td><td>260.218</td><td>254.718</td><td>249.218</td></tr> <tr><td>CPO Production</td><td>Ton</td><td>55.309</td><td>55.560</td><td>54.195</td><td>52.839</td><td>51.713</td></tr> <tr><td>PK Production</td><td>Ton</td><td>14.907</td><td>14.349</td><td>14.052</td><td>13.755</td><td>13.707</td></tr> <tr><td>OER</td><td>%</td><td>20,41</td><td>20,91</td><td>20,83</td><td>20,74</td><td>20,75</td></tr> <tr><td>KER</td><td>%</td><td>5,50</td><td>5,40</td><td>5,40</td><td>5,40</td><td>5,50</td></tr> </tbody> </table> <p>Production Cost (IDR/Ton CPO):</p> <table border="1" data-bbox="667 1358 1704 1386"> <thead> <tr> <th>Description</th> <th>UOM</th> <th>Cost Estimation (IDR)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Year of Planted	Ha	Estimated production (Ton)					2020	2021	2022	2023	2024	1994	132	4.140	156	-	-	-	1995	300	7.800	1.488	-	-	-	1996	384	9.103	1.747	-	-	-	2008	512	12.288	12.852	-	-	-	2016	295	-	4.130	6.490	7.375	7.965	2017	449	-	-	6.286	9.878	11.225	2018	447	-	-	-	6.258	9.834	Total	2.519	33.331	20.373	12.776	23.511	29.024	Description	UOM	Estimated Production (Ton)					2020	2021	2022	2023	2024	FFB Processed	Ton	271.040	265.718	260.218	254.718	249.218	CPO Production	Ton	55.309	55.560	54.195	52.839	51.713	PK Production	Ton	14.907	14.349	14.052	13.755	13.707	OER	%	20,41	20,91	20,83	20,74	20,75	KER	%	5,50	5,40	5,40	5,40	5,50	Description	UOM	Cost Estimation (IDR)				
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Criterion / Indicator		Assessment Findings						Compliance																																	
				2020	2021	2022	2023	2024																																	
		Estate Cost	IDR	2.736.659	2.508.604	2.805.075	2.326.160	2.791.392																																	
		POM Cost	IDR	294.771	279.537	324.248	321.468	372.885																																	
		Total	IDR	3.031.429	2.788.141	3.129.323	2.647.627	3.164.277																																	
3.1.2	<p>An annual replanting program 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.</p> <p>- Minor compliance-</p>	<p>Bungo Tebo POM and Estate:</p> <p>Company has made the replanting programme since 2016 until 2019 for year of planted 1994 - 1996. Replanting has been completed in 2019. Below are the realization of replanting programme 2016 – 2019 PT Rigunas Agri Utama – Bungo Tebo Estate:</p> <table border="1"> <thead> <tr> <th>Year of Planted</th> <th>Block</th> <th>Year of Replanting</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>1995</td> <td>A95a, A95b, A95c, A95d, A95e, A95d</td> <td>2016</td> <td>295</td> </tr> <tr> <td>1994, 1995, 1996</td> <td>B95f, B95g, B96o, B96p, B96q, B96r, C94d, C94e, C94f, C95f, C95g, C96k, C96i</td> <td>2017</td> <td>449</td> </tr> <tr> <td>1994, 1995</td> <td>A94a, A94h, A94l, A95j, A96e, A96g, C96i, C96j, C96m</td> <td>2018</td> <td>447</td> </tr> <tr> <td>1994, 1995, 1996</td> <td>A94g, A94k, A96i, A96f, A96g, B95h, B95j, B95k, B95l, B96t, B96u, B95i, B96s, B96v, B96w, B96x, C95e, C96g, C96h</td> <td>2019</td> <td>787</td> </tr> <tr> <td>Sub Total</td> <td></td> <td></td> <td>1.978</td> </tr> </tbody> </table> <p>Replanting activity performed mechanically and zero burning. During field visit, it can be demonstrated that company has apply zero burning for replanting activity.</p> <p>Company also has programmed the replanting for year of planted 2008 in 2035 as table below:</p> <table border="1"> <thead> <tr> <th>Year of Replanting</th> <th>Block</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>2035</td> <td>D08a-D08o</td> <td>512</td> </tr> <tr> <td>Total Planted</td> <td></td> <td>2.490</td> </tr> </tbody> </table>						Year of Planted	Block	Year of Replanting	Hectare	1995	A95a, A95b, A95c, A95d, A95e, A95d	2016	295	1994, 1995, 1996	B95f, B95g, B96o, B96p, B96q, B96r, C94d, C94e, C94f, C95f, C95g, C96k, C96i	2017	449	1994, 1995	A94a, A94h, A94l, A95j, A96e, A96g, C96i, C96j, C96m	2018	447	1994, 1995, 1996	A94g, A94k, A96i, A96f, A96g, B95h, B95j, B95k, B95l, B96t, B96u, B95i, B96s, B96v, B96w, B96x, C95e, C96g, C96h	2019	787	Sub Total			1.978	Year of Replanting	Block	Hectare	2035	D08a-D08o	512	Total Planted		2.490	Comply
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<p>Principle 4: Use of appropriate best practices by growers and millers</p>																																									

Criterion / Indicator	Assessment Findings	Compliance
<p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>		
<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available. - Major compliance -</p> <p>Bungo Tebo POM and Estate: The company has procedures for estate beginning from land preparation up to replanting, such as:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 Nursery; 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 New Planting; 3. SOP AA-APM-OP-1100.03-R2 24/07/2015 Road and Bridge Construction and Maintenance explains road and bridge construction and maintenance; 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Drainage Construction and Maintenance explains culvert/drainage construction and maintenance; 5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Soil & Water Conservation; 6. SOP AA-APM-OP-1100.06-R5 16/02/2017 Planting cover crops; 7. SOP AA-APM-OP-1100.07-R6 16/02/2017, Oil Palm Planting; 8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Weed control; 9. SOP AA-APM-OP-1100.09. R6 12/06/2017 Fertilizer application; 10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pests and Disease Control; 11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pesticide handling and Management; 12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Castration explain cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested; 13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Pruning; 14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Census and Palm identification; 15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Production census; 16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Consolidation, Provision of support to fallen palm; 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Water management;</p> <p>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Harvesting;</p> <p>19. SOP AA-APM-OP-1100.19. R1 01/02/2009 FFB Transport;</p> <p>20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting;</p> <p>Bungo Tebo POM has established a procedure to process the FFB to become CPO and PK begins from reception of FFB to dispatch of CPO and PKO:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 FFB receiving station; 2. SOP AA-MPM-OP-1400.03.R1 Sterilizer station; 3. SOP AA-MPM-OP-1400.04.R1 Thresher station and loose fruit separation; 4. SOP AA-MPM-OP-1400.05-R1 Pressing station; 5. SOP AA-MPM-OP-1400.06-R1 Clarification station; 6. SOP AA-MPM-OP-1400.07-R1 Nut and fiber separation; 7. SOP AA-MPM-OP-1400.08-R1 Kernel station; 8. SOP AA-MPM-OP-1400.09-R1 Boiler station; 9. SOP AA-MPM-OP-1400.10-R1 Engine room station; 10. SOP AA-MPM-OP-1400.11-R1 Water treatment station; 11. SOP AA-MPM-OP-1400.12-R1 Laboratorium; 12. SOP AA-MPM-OP-1400.13-R1 Palm oil mill effluent treatment; 13. SOP AA-MPM-OP-1400.14-R2 CPO and kernel bulking and despatch operation; 14. SOP AA-MPM-OP-1400.15-R1 Preventive maintenance; <p>The mill operational procedures explains the flow process, specification of material and process, machinery and tools required, step-by-step process, control, monitoring and measurement and health and safety requirements.</p> <p>Scheme Smallholder:</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Kebun Plasma Bungo Tebo has established and maintained guidance to perform and monitor the best agriculture practise. SOP was follow the procedure of PT Inti Indosawit Subur. The procedure were sighted, for example:</p> <ol style="list-style-type: none"> 1. SOP AA-Plasma-PP-KS-01; Nursery; dated 1 Sept 2011. 2. SOP AA-Plasma-PP-KS-02; Pest and Disease Control; dated 1 Sept 2011. 3. SOP AA-Plasma-PP-KS-03; Fertilizing; dated 1 Sept 2011. 4. SOP AA-Plasma-PP-KS-04; Harvesting; dated 1 Sept 2011. 5. SOP No.007/DOK/SOP/AA2016; Internal Communication Group Certification. 6. SOP No.013/DOK/SOP/AA/2016; Assessment and Inspection Member Group Plantation. 7. SOP No. 020/DOK/SOP/AA/2016; FFB Sale Mechanism. 8. AA-SOP-06-KLO dated 1 February 2009; Weeds Control. <p>Manager of Kebun Plasma Bungo Tebo in cooperation with Koperasi has developed training programme for Good Agriculture Practise according to the procedure for smallholder. Record of training refer to indicator 4.8.2.</p>	
<p>4.1.2</p> <p>Checking or monitoring of operations procedures is conducted at least once a year.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>To checking and monitoring of operations procedures, PT Rigunas Agri Utama – Bungo Tebo POM has conducted internal audit and visit both in estate and mill:</p> <ul style="list-style-type: none"> - PT Rigunas Agri Utama – Bungo Tebo POM follows procedure for internal audit under Standard Operating Procedures AA-SOP-ES-6001-R3 10/06/2015. The procedure stated internal audit performed minimum once a year. Upon finding, management unit shall prepare review on audit finding and prepare root cause analysis, prepare corrective action – with person in charge and completion target. The internal audit has been performed once a year as per procedure. The latest RSPO internal audit was done in 1 – 4 October 2019. Audit result findings can be demonstrated and and the corrective action has been implemented to addressed issue found during audit. - R&D Agronomic Visit Report, conducted once a year to check and monitoring the implementation of Agronomy best management practices particularly for plant upkeep. Latest visit performed in Bungo Tebo Estate on 17 – 18 June 2019 by Era Wahyudi. During visit found some issue and has been followed 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>up by Estate management.</p> <ul style="list-style-type: none"> - R&D Pest and Disease Visit Report, conducted once a year to check and monitoring the implementation of integrated pest management and pest and disease monitoring. Latest visit performed in Bungo Tebo Estate on 21 - 22 June 2019 by Daniel Erikson H. During visit there is no issue found, generally pest and disease control has been well implemented. - Visiting Agent conducted once a year to check and monitoring the implementation of general Agronomy best management practices. Last visit performed at Bungo Tebo Estate on 27 – 31 May 2019 by Sinnaiha G. During visit found some issue and has been followed up by Estate management. - QC Agronomy inspection performed each month by QC staff to check quality of plantation and FFB covering: unpicked loosefruit, unpicked FFB, pruning, under ripe FFB, over ripe FFB, EFB, long stalk, abnormal, etc. Latest QC report September 2019 shown that QC inspection result was good with QC score 181 (green category). - Visiting Engineering (VE) performed once a year to check and monitoring the implementation of mill operation procedure. Latest VE performed on 12 – 16 March 2019 by TCJ Thomas. There were some issues raised during visit and has been followed up by Estate management. Document of Action plan VE visit were available and can be demonstrated. - QC inspection performed minimum once a month by QC Departement from Head Office to monitor and check the mill operation including the quality of process and product. Latest QC inspection conducted on 7 – 10 October 2019 by Ramidin Purbo. There were some issue found during QC inspection mainly oil loses, Mill management has taken action to minimize the oil loses. <p>Based on verification of document internal audit and visit above as well as the company correction and corrective action to the audit result indicated that the organization has well implemented of checking and monitoring of operations procedures.</p> <p>Scheme Smallholder:</p> <p>Plasma Bungo Tebo has determined the Internal Audit Program period 2018 – 2021. Each Koperasi, KT and its member schedule has been determined in the audit program. Internal audit performed by the company internal auditor. RSPO Internal audit for Kebun Plasma Bungo Tebo conducted by Sustainability</p>	

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	<p>team of Asian Agri Group to check and ensure the plasma management was comply against regulation and RSPO standard. Internal audit performed once a year;</p> <ul style="list-style-type: none"> ▪ Latest internal audit performed in Koperasi Sawit Makmur Bersama on 7 Oct 2019, resulting 4 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. ▪ Latest internal audit performed in Koperasi Barokah as Harapan on 3 Oct 2019, resulting 4 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. ▪ Latest internal audit performed in Koperasi Sawit Tanduk Perkasa on 8 Oct 2019, resulting 7 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. ▪ Latest internal audit performed in Koperasi Sawit Sumay Makmur on 4 Oct 2019, resulting 4 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. ▪ Latest internal audit performed in Koperasi Sawit Keluarga Sejahtera on 5 Oct 2019, resulting 5 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. <p>To check the quality of FFB harvested by farmers according to the procedure and FFB quality standard, sortation conducted at Mill loading ramp. FFB quality divided in to category: normal, abnormal, empty bunch, long stalk and unripe bunch. Based on FFB quality period October 2019, sortation result of Plasma Bungo Tebo FFB Division I are 2.3% unripe; 91.0% ripe; 2.7% over ripe; 0.8% empty bunch; 3.2% long stalk; 7.5% loose fruit; 0.9% thrash. Division II are 2.0% unripe; 91.5% ripe; 2.6% over ripe; 1.2% empty bunch; 2.8% long stalk; 8.0% loose fruit; 0.9% thrash. Division III are 1.9% unripe; 91.5% ripe; 2.6% over ripe; 1.1% empty bunch; 0.2% abnormal; 2.7% long stalk; 7.7% loose fruit; 0.8% thrash.</p> <p>Plasma Bungo Tebo performed weeds control monitoring in monthly basis to monitor the work progress of upkeep in each KT and Koperasi. The activity recorded in "Rencana dan Realisasi Kerja Tahun 2018".</p> <p>Head of Smallholder Visit conducted once a year to monitor the implementation of best management practice, infrastructure condition, FFB quality of harvesting. Latest visit in Bungo Tebo Plasma conducted</p>	

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	on 3 – 5 April 2019 by Rudi Rismanto. Visit report was available and Bungo Tebo Plasma has performed action taken for any issue from the visit result.	
<p>4.1.3</p> <p>Records of monitoring and any follow-up actions shall be available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Records of monitoring and any follow up actions can be demonstrated during audit, such as:</p> <ul style="list-style-type: none"> - RSPO internal audit report, which done in 1 – 4 October 2019. Audit result findings can be demonstrated and the corrective action has been implemented to addressed issue found during audit. - R&D Agronomic Visit Report Bungo Tebo Estate No. R&D-AGRO-KBT-June-01-2019 dated 17 – 18 June 2019 by Era Wahyudi. Generally there is no significant issue found during visit. All issue found during visit has been addressed by company such as: planting of kacang (<i>Pueraria javanica</i> and <i>Calopogonium mucunoides</i>) was expand by weeds <i>asystasia</i>, it has been followed up by weeds control and replant the kacang. - R&D Pest and Disease Visit Report Bungo Tebo Estate No. R&D-P&D-KBT-JUN-02-2019 dated 21 - 22 June 2019 by Daniel Erikson H. During visit there is no issue found, generally pest and disease control has been well implemented. - Visiting Agent report No. VA-KBT-MAY-FULL-01-2019, date visit 27 – 31 May 2019 by Sinnaiha G. All issue found during visit has been addressed by company such as: Growth of significant number of palms in the terraced areas OP17 & OP18 (Afdeling 3) was not maximal due to narrow or damaged circles resulting from erosion and lack of proper space for fertilizer application. Estate management has taken action by consolidate the palm base and repair the damage circles by consolidating with bags (Tapak kuda) and programme a round of EFB application as fertilizer media to improve fertilizer uptake. - QC Agronomy report "Rekapitulasi Pemeriksaan QC – Bulan September 2019" performed each month by QC staff to check quality of plantation and FFB covering: unpicked loosefruit, unpicked FFB, pruning, under ripe FFB, over ripe FFB, EFB, long stalk, abnormal, etc. Latest QC report September 2019 shown that QC inspection result was good with QC score 181 (green category). - Visiting Engineering (VE) report No. VE-PBT-MAR-FULL 01-2019, visit date 12 – 16 March 2019 by TCJ Thomas. All issue found during visit has been addressed by company such as: deep erosion of metal about 6 mm deep along the weld line of wear liners was noted during visit. Insufficient anti corrosion painting on damaged weld line of wear liner had aggravated the weld damage. Bungo Tebo POM has 	<p>NC # 1839713- 201910-N1 OPEN</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>taken action by replacing the wear liner and monitoring the durability of new wear liner and recondition.</p> <ul style="list-style-type: none"> - Production Performance report, explained the FFB production performance and evaluation as well as determined production target for next year. Evaluation FFB production each block to date March 2019 can be demonstrated in "Laporan Unit Kebun Bungo Tebo September 2019" - Daily Report Bungo Tebo POM, contain information covering FFB receiving, FFB process: gross and net FFB processed, FFB stock, shift hour, process hour, press hour, press capacity, sterilizer process, Utility factor commercial and capacity, CPO and PK production, CPO and PK extraction rate, CPO and PK quality. Process performance evaluated each day by mill manager and some corrective action to addressed some issue has been develop by Bungo Tebo POM. <p>Scheme Smallholder:</p> <p>Records of monitoring and any follow up actions can be demonstrated during audit, such as:</p> <ul style="list-style-type: none"> - RSPO Internal audit for Smallholder management conducted by Sustainability team of Asian Agri Group to check and ensure the plasma management was comply against regulation and RSPO standard. Internal audit performed once a year; <ul style="list-style-type: none"> • Latest internal audit performed in Koperasi Sawit Makmur Bersama on 7 Oct 2019, resulting 4 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. Corrective action plan related to document control. • Latest internal audit performed in Koperasi Barokah as Harapan on 3 Oct 2019, resulting 4 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. Corrective action plan related to document control. • Latest internal audit performed in Koperasi Sawit Tanduk Perkasa on 8 Oct 2019, resulting 7 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. Corrective action plan related to document control. • Latest internal audit performed in Koperasi Sawit Sumay Makmur on 4 Oct 2019, resulting 4 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. Corrective action plan related to document control. 	

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Latest internal audit performed in Koperasi Sawit Keluarga Sejahtera on 5 Oct 2019, resulting 5 non-conformities. Corrective action plans have been determined, and all non-conformities have been closed on 15 Oct 2019. Corrective action plan related to document control. - Head of Smallholder Visit conducted once a year to monitor the implementation of best management practice, infrastructure condition, FFB quality of harvesting. Latest visit in Bungo Tebo Plasma conducted on 3 - 5 April 2019 by Rudi Rismanto. Issue raised consist of bad road condition in Hamparan 6 SP I. Action Plan: road hardening using heavy equipment and stone; maintaining old road as alternative. <p>Non conformity raised during audit:</p> <p>Monitoring and inspection of plantation block of smallholder member for each KUD has been developed, however the follow up action were not available. It was also found during field visit:</p> <ul style="list-style-type: none"> - Kavling 1369 KUD Sawit Tanduk Perkasa: weeds condition uncontrolled. According to monitoring result on 31/07/2019 also confirmed that weeds condition were uncontrolled, 1 boundary pegs were not available. There is no follow up action. - Kavling 1362 KUD Sawit Tanduk Perkasa: Frond stacking were not implemented, 1 boundary pegs were not available. According to monitoring result on 31/07/2019 1 boundary pegs were not available. There is no follow up action. - Kavling 407 KUD Sumay Makmur: 1 boundary pegs were not available, weeds condition uncontrolled, frond stacking were not implemented. Monitoring result on 07/01/2019 were not follow up. - Kavling 280 KUD Sumay makmur: weeds condition uncontrolled, frond stacking were not implemented - Kavling 475 KUD Barokah: 1 boundary pegs were not available, frond stacking were not implemented. - Kavling 668 KUD Barokah: weeds condition uncontrolled, frond stacking were not implemented - Kavling 1529 KUD Sawit Makmur Bersama: weeds condition uncontrolled, frond stacking were not implemented 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>- Kavling 1375 KUD Sawit Tanduk Perkasa: weeds condition uncontrolled, frond stacking were not implemented.</p> <p>Based on Monitoring result on 07/01/2019 above which done by Plasma Management Bungo Tebo, there is no follow up action were evident againts the finding.</p>	
<p>4.1.4</p> <p>Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM has a policy related to purchase of noncertified FFB under “Kebijakan Perusahaan” dated 1 December 2014”. Point 17 of the policy stated “Melakukan komunikasi dan evaluasi kepada pihak ketiga terkait asal penerimaan TBS dari lahan yang legalitasnya dapat dibuktikan; tidak ada pembakaran untuk pembukaan areal baru maupun peremajaan (replanting); tidak melakukan pembukaan areal gambut setelah September 2014; tidak terdapat konflik lahan dan tidak mempekerjakan anak-anak dalam pengelolaannya”. The meaning is to communicate and evaluate third party related to purchase of FFB from legally demonstrable area; no burning for new development or replanting; no new development in peat area after September 2014; no land conflict and not employing children in the process.</p> <p>The company has also established SOP “Pengawasan Sumber Pembelian TBS Luar” (AAMM-506.2.R1) dated 1 September 2017. The objective of the procedure was to ensure third party FFB sourced from non-forest area, completed with legal use of the land. The SOP covers requirements that outside FFB supplier must provide statement letter and location map and GPS coordinate; legality documentation of the supplier such as SKGR, SK Camat and certificate. Compare location map with Rencana Tata Ruang Wilayah Provinsi (RTRWP) or Tata Guna Hutan Kesepakatan (TGHK). Verification of location by FFB Manager. For supplier categorized as agen, team conducted visit to the loading ramp; if agen bought FFB from farmer with delivery note, then team conducted visit directly to FFB source. Team established supplier data base and updated in 6 month interval.</p> <p>SOP Traceability – FFB Purchase (AA-SOP-MM-506.4-R1) dated 1 September 2017. The objective of the SOP is to tighten internal monitoring to minimize unwanted business risk. The SOP stated that all FFB supplier must have legal requirements comply to the applicable regulation in Indonesia; and all FFB supplier must have Statement Letter that all FFB delivered to Bungo Tebo POM are not from forest area, no deforestation, zero burning and not employed children.</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>The are Seven (7) registered FFB supplier that supplied FFB to Bungo Tebo POM, which is PDASAN Jaya, Pandawa Lima Lapan, CV Asri Bersaudara, SDR, Koperasi Sawit Makmur, UD Royal and Koperasi Sawit Tanduk Perkasa.</p> <p>FFB that supplied from area that legally contested or coming from protected forest, plantation forest, conservation area – will be rejected. During audit evidence of supplier verification can be demonstrated for example supplier PDASAN Jaya, Pandawa 58 and UD Royal, filed verification conducted to all of their planted area and source of FFB from the local farmer. Verification result completed with farmer name, location, year planting and GPS coordinate. During audit overlay maps of supplier plantation location with forest area maps as per "SK.727/menhut-II/2012" shown that all plantation area was in APL (other pupose) area and not in forest area.</p> <p>The cooperation agreement between company and local supplier recorded in the "Surat Pernyataan dan Jaminan". e.g., Surat Pernyataan dan Jaminan CV Asri Bersaudara dated 21 December 2015; Surat Pernyataan dan Jaminan SDR dated 21 December 2015; Surat Pernyataan dan Jaminan Koperasi Sawit Makmur dated 12 January 2016; Surat Pernyataan dan Jaminan Koperasi Sawit Tanduk Perkasa dated 19 December 2015. A statement and warranty stating that the supplier is willing to comply with the provisions of PT Rigunas Agri Utama and FFB received from land that has been controlled in accordance with the laws and regulations and does not originate from restricted areas such as protected forest areas, industrial forest estate, production forest area and conservation areas.</p> <p>FFB receiving from third party recorded each day in "Laporan Harian Pabrik" and reported each month in "Laporan Unit Pabrik". Below are the FFB received since January to September 2019 from third party supplier:</p> <ul style="list-style-type: none"> - Pdasan Jaya: 3,708,005 kg - Pandawa Lima Lapan: 0 - CV Asri Bersaudara: 22,246,960 kg - SDR: 35,798,806 kg - Koperasi Sawit Makmur: 483,900 kg - UD Royal: 16,773,276 kg 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>- Koperasi Sawit Tanduk Perkasa: 2,753,730 kg</p>	
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>		
<p>4.2.1</p>	<p>A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available.</p> <p>- Major compliance -</p> <p>Bungo Tebo POM and Estate: The company has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and when fertilizer is applied. To maintain soil fertility, Bungo Tebo Estate applied placing palm frond above ground level (L shape) and empty bunch application as well as Palm Oil Mill Effluent (POME) application (land application). During field visit can be demonstrated that company has applied management strategy to maintain soil fertility according to the procedure. Bungo tebo Estate applied inorganic fertilizer. Record of fertilizer application in Bungo Tebo Estate 2019 as a recommendation are available in "Fertilizer application and recommendation 2018 Bungo Tebo Estate". Record of fertilizer input described in 4.2.2.</p> <p>Scheme Smallholder: Plasma Bungo Tebo has established procedure soil fertility in AA-PLASMA-PP-KS-03 – Panduan Pelaksanaan Pemupukan. The procedure covered type of fertilizer and its content, fertilizer quality analysis, fertilizer recommendation and fertilizer application which must be appropriate in dosage, time, place and technique. Application technique on Section 2.4 mention that main principle of fertilizer application is every palm must receive all fertilizer type based on recommendation. Fertilizer application conducted based on basic principles: accurate dosage, time, place and technique. To maintain soil fertility, plasma management also applied palm frond stacking in 'U' shape around palm oil trees. Plasma Bungo Tebo also applied inorganic fertilizer to maintain soil fertility. Record of fertilizer input mentioned in 4.2.2.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance																																											
<p>4.2.2 Records of fertilizer inputs shall be available. - Minor compliance -</p>	<p>The company has set the fertilizer recommendations each year by Research and Development department and recorded in Recommendation Fertilization Bungo Tebo Estate 2019. Fertilizer recommendation was develop based on periodical leaf sampling analysis and soil sampling analysis. Records of fertilizer input in Bungo Tebo Estate was available.</p> <p>Fertilizer recommendation in 2019 and fertilizer application from January – September 2019 in Bungo Tebo Estate:</p> <table border="1" data-bbox="663 630 1565 900"> <thead> <tr> <th>Fertilizer Type</th> <th>Recommendation (kg)</th> <th>Realization (kg)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>ZA</td> <td>462.924</td> <td>434.353</td> <td>94</td> </tr> <tr> <td>MOP</td> <td>385.611</td> <td>229.976</td> <td>60</td> </tr> <tr> <td>Rock Phosphate</td> <td>186.084</td> <td>186.086</td> <td>100</td> </tr> <tr> <td>Kieserite</td> <td>49.810</td> <td>49.810</td> <td>100</td> </tr> <tr> <td>Dolomite</td> <td>195.139</td> <td>195.139</td> <td>100</td> </tr> <tr> <td>HGFB</td> <td>21.540</td> <td>21.540</td> <td>100</td> </tr> </tbody> </table> <p>Scheme Smallholder</p> <p>Plasma Bungo Tebo has set the fertilizer recommendations assist by PT Rigunas Agri Utama based on leaf sampling analysis. Fertilizer input and recommendation recorded in "Rekomendasi Pemupukan Kelapa Sawit 2019 Kebun Plasma Bungo Tebo". Fertilizer recommendation and input for each Koperasi were available, as follows:</p> <table border="1" data-bbox="663 1126 1579 1359"> <thead> <tr> <th>Fertilizer recommendation</th> <th>Div I (Koperasi Sawit Makmur Bersama)</th> <th>Koperasi Barokah</th> <th>Koperasi Sawit Tanduk perkasa</th> <th>Koperasi Sawit Sumay Makmur</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;">ZA</td> </tr> <tr> <td>Dosage</td> <td colspan="4">3 kg (2 x application)</td> </tr> </tbody> </table>	Fertilizer Type	Recommendation (kg)	Realization (kg)	Percentage (%)	ZA	462.924	434.353	94	MOP	385.611	229.976	60	Rock Phosphate	186.084	186.086	100	Kieserite	49.810	49.810	100	Dolomite	195.139	195.139	100	HGFB	21.540	21.540	100	Fertilizer recommendation	Div I (Koperasi Sawit Makmur Bersama)	Koperasi Barokah	Koperasi Sawit Tanduk perkasa	Koperasi Sawit Sumay Makmur	ZA					Dosage	3 kg (2 x application)				<p>Comply</p>
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Criterion / Indicator	Assessment Findings					Compliance	
	Recommendation (kg)	241,152	142,848	283,392	329,472		
	Realisation (kg)	241,152	142,848	283,392	329,472		
	RP						
	Dosage	1 kg (1 x application)					
	Recommendation (kg)	80,384	47,616	94,464	109,824		
	Realisation (kg)	80,384	47,616	94,464	109,824		
	MOP						
	Dosage	3 kg (2 x application)					
	Recommendation (kg)	241,152	142,848	283,392	329,472		
	Realisation (kg)	241,152	142,848	283,392	329,472		
	Dolomite						
	Dosage (kg)	1 kg (1 x application)					
	Recommendation (kg)	80,384	47,616	94,464	109,824		
	Realisation	80,384	47,616	94,464	109,824		
	HGFB						
	Dosage	0,10 kg (1 x application)					
	Recommendation (kg)	8,038	4,762	9,446	10,982		
	Realisation (kg)	8,038	4,762	9,446	10,982		
	<p>Fertilizer realization in Bungo Tebo Plasma 2019 has completed 100% as recommendation. Record of fertilizer issuance can be seen on "Bukti Permintaan Pemakaian Barang" (BPPD). For example BPPD No.05/PPK/KLO/01/2019 dated 16 Jan 2019 for Hambaran 65 SP 7 (Koperasi Sawit Tanduk Perkasa), fertilizer Dolomite, quantity 1,000 kg. Followed by "Surat Pengakuan Hutang" (statement of debt) No.KLO/2019/01/SPH-PUPUK/011, for Fertilizer Dolomite, quantity 1,000 kg; unit price Rp 1,130/kg; total</p>						

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	<p>Rp 1,130,000. The document signed by Secretary and Chairman of Koperasi, checked by Division Assistant and KTU, approved by Manager of Kebun Plasma Bungo Tebo.</p> <p>Field visit verification:</p> <p>KUD Sawit Makmur Bersama <i>Hamparan 56</i>, block No.1530, fertilizer applied in 2019 comprised of MOP 8 sacks, ZA 8 sacks, Dolomite 5 sacks, Rock Phospate 5 sacks, Borate 25 kg;</p> <p>KUD Sawit Tanduk Perkasa <i>Hamparan 69</i>, block No.1725, Sayuti, fertilizer applied in 2019 comprised of MOP 8 sacks, ZA 8 sacks, Dolomite 5 sacks, Rock Phospate 5 sacks, Borate 25 kg;</p> <p>KUD Sawit Sumay Makmur <i>Hamparan 03</i>, block No.280, fertilizer applied in 2019 comprised of MOP 8 sacks, ZA 10 sacks, Dolomite 10 sacks, Rock Phospate 10 sacks, Borate 12.5 kg;</p>	
<p>4.2.3</p> <p>Records of periodical leaf, soil and visual analysis shall be available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama – Bungo Tebo Estate conducted periodical leaf sampling analysis to provide fertilizer recommendation for the upcoming year. Analysis done by PT Nusa Pusaka Kencana Analytical & QC Laboratory. Latest leaf sampling analysis conducted on 08 May 2018, as evident in Foliar Analysis Report No. 095/INT/R&D/MEI/L/18 dated 25 May 2018. Number of leaf sample Afdeling IV: 24 samples; Afdeling I: 12 samples. Sample of result e.g. Afd. I sample Ref no. 18L07643; Block A16A; YOP 2016; Frond 17, Ash 6.79%, N 2.34%, P 1.159%, K 1.48%, Mg 0.28%, Ca 0.63%, B 13%.</p> <p>PT Rigunas Agri Utama – Bungo Tebo Estate provides soil fertility test/soil type analysis based on Research and Development Asian Agri Group dated 09/04/2018. The soil type/classification result of Sentral Estate consist of 5 soil profil as below:</p> <ul style="list-style-type: none"> - Profil I Block D08i/2008, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: 105 cm, epipedon: okrik, horizon: argilik, soil classification: typic endoaquults. 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Profil II Block A94i/1994, topography: Hilly 33 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic hapludults. - Profil III Block D08h/2008, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic endoaquults. - Profil IV Block C17e/2017, topography: hilly 32 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic hapludults. - Profil IV Block B96w/1996, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: 120 cm, epidedon: okrik, horizon: kambik, soil classification: Aquic dystrodepts. <p>Scheme Smallholder:</p> <p>Leaf sampling analysis conducted each year. Leaf sampling analysis conducted by PT Nusa Pusaka Kencana Analytical and QC Laboratory. Sample seen:</p> <ul style="list-style-type: none"> - Kebun Plasma Bungo Tebo – Afd II (Koperasi Barokah and Koperasi Sawit Sumay Makmur): Latest analysis reported based on Foliar Analysis Report No.180/INT/R&D/OKT/L/18 dated 12/10/2018 with 8 samples analyzed. Result sample No.13L17017; Block <i>Hamparan</i> 113; 8.39% Ash; 2.55% N; 0.176% P; 0.89% K; 0.18% Mg; 0.80% Ca; 11 ppm Cu. - Kebun Plasma Bungo Tebo – Afd III (Koperasi Sawit Makmur Bersama and Koperasi Sawit Tanduk Perkasa): Latest analysis reported based on Foliar Analysis Report No.180/INT/R&D/OKT/L/18 dated 12/10/2018 with 9 samples analyzed. Result sample No.13L17026; Block <i>Hamparan</i> 93; 11.92% Ash; 2.18% N; 0.137% P; 0.80% K; 0.17% Mg; 0.74% Ca; and 10 ppm Cu. <p>Latest Soil Analysis conducted based on Soil Analysis Report No.022/INT/R&D/AGT/S/19 dated 03/08/2019, with 12 samples analysed. Result sample no. 13S1489; Block Boring SP 7; Depth 15-30 cm; particle size: 27% coarse sand; 17% fine sand; 20% silt; 36% clay; 0.09% N; 0.87% organic C.</p>	

Criterion / Indicator	Assessment Findings	Compliance																																																																																																			
<p>4.2.4 A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Bungo Tebo Estate has recorded use of nutrient recycling strategi by application of empty fruit bunch (EFB), land application and use of palm residues after replanting. Dosage of EFB application in mature oil palm was 250 kg/palm/year and for immature plantation 125 kg/palm/year. Rotation for EFB application is 12 months. Total EFB application in Bungo Tebo Estate for January to September 2019 was 19,886,385 kg, it was 112% from the total budget 17,761,013 kg.</p> <p>Sample document of EFB application program and realization are as follow:</p> <p>Mature:</p> <table border="1" data-bbox="663 710 1574 1107"> <thead> <tr> <th>Afd</th> <th>Block</th> <th>YOP</th> <th>Ha</th> <th>Population</th> <th>Program (kg)</th> <th>Realisation (kg)</th> </tr> </thead> <tbody> <tr> <td rowspan="12">I</td> <td>A16a</td> <td>2016</td> <td>35</td> <td>4,797</td> <td>887,445</td> <td>8,750</td> </tr> <tr> <td>A16b</td> <td>2016</td> <td>39</td> <td>5,530</td> <td>1,023,050</td> <td>478,000</td> </tr> <tr> <td>A16c</td> <td>2016</td> <td>35</td> <td>4,892</td> <td>905,020</td> <td>715,150</td> </tr> <tr> <td>A16d</td> <td>2016</td> <td>28</td> <td>4,034</td> <td>746,290</td> <td>-</td> </tr> <tr> <td>A16e</td> <td>2016</td> <td>29</td> <td>4,326</td> <td>800,310</td> <td>-</td> </tr> <tr> <td>A16f</td> <td>2016</td> <td>28</td> <td>3,974</td> <td>735,190</td> <td>20,000</td> </tr> <tr> <td>A16g</td> <td>2016</td> <td>20</td> <td>2,846</td> <td>526,510</td> <td>19,500</td> </tr> <tr> <td>A16h</td> <td>2016</td> <td>24</td> <td>3,407</td> <td>630,295</td> <td>-</td> </tr> <tr> <td>A16i</td> <td>2016</td> <td>25</td> <td>3,508</td> <td>648,980</td> <td>-</td> </tr> <tr> <td>A16j</td> <td>2016</td> <td>32</td> <td>4,465</td> <td>826,025</td> <td>272,400</td> </tr> <tr> <td colspan="3">Total</td> <td>295</td> <td>41,779</td> <td>7,729,115</td> <td>1,513,800</td> </tr> </tbody> </table> <p>Immature:</p> <table border="1" data-bbox="663 1193 1574 1374"> <thead> <tr> <th>Afd</th> <th>Block</th> <th>YOP</th> <th>Ha</th> <th>Population</th> <th>Program (kg)</th> <th>Realisation (kg)</th> </tr> </thead> <tbody> <tr> <td rowspan="4">I</td> <td>A18a</td> <td>-</td> <td rowspan="2">197</td> <td rowspan="2">28,278</td> <td rowspan="2">3,534,750</td> <td rowspan="2">5,858,130</td> </tr> <tr> <td>A18g</td> <td>2018</td> </tr> <tr> <td>A19a</td> <td>-</td> <td rowspan="2">187</td> <td rowspan="2">26,554</td> <td rowspan="2">3,319,250</td> <td rowspan="2">2,866,022</td> </tr> <tr> <td>A19f</td> <td>2019</td> </tr> </tbody> </table>	Afd	Block	YOP	Ha	Population	Program (kg)	Realisation (kg)	I	A16a	2016	35	4,797	887,445	8,750	A16b	2016	39	5,530	1,023,050	478,000	A16c	2016	35	4,892	905,020	715,150	A16d	2016	28	4,034	746,290	-	A16e	2016	29	4,326	800,310	-	A16f	2016	28	3,974	735,190	20,000	A16g	2016	20	2,846	526,510	19,500	A16h	2016	24	3,407	630,295	-	A16i	2016	25	3,508	648,980	-	A16j	2016	32	4,465	826,025	272,400	Total			295	41,779	7,729,115	1,513,800	Afd	Block	YOP	Ha	Population	Program (kg)	Realisation (kg)	I	A18a	-	197	28,278	3,534,750	5,858,130	A18g	2018	A19a	-	187	26,554	3,319,250	2,866,022	A19f	2019	<p>Comply</p>
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Criterion / Indicator		Assessment Findings						Compliance
		II	B17a – 2017	185	26,110	3,263,750	-	
			B17g					
			B19a – 2019	512	-	-	-	
		B19q						
		III	C17a – 2017	264	36,332	4,541,500	287,400	
			C17i					
			C18a – 2018	250	29,459	3,682,375	6,385,374	
			C18i					
		C19a – 2019	88	12,232	-	-		
		C19e						
Total				1,683			15,608,906	
<p>Scheme Smallholder Nutrient recycling strategy in Bungo Tebo plasma was applied by frond stacking between palm oil trees using 'U' shape to increase organic material and improved the soil structure and fertility. There is no EFB application and Land Application due to distance from mill reason.</p>								

Criterion / Indicator	Assessment Findings	Compliance																																										
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>																																												
<p>4.3.1 Maps of any fragile soils shall be available. - Major compliance -</p>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama showed Peta Sebaran Satuan Tanah for Bungo Tebo Estate. The map indicated the predominant soil type consist of :</p> <table border="1" data-bbox="667 624 1592 1193"> <thead> <tr> <th>Soil classification</th> <th>Slope (%)</th> <th>Drainage</th> <th>Class of land</th> <th>Limitation factor</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>Aquic dystrudepts</td> <td>0 – 8</td> <td>Bad</td> <td>Suitable (S3)</td> <td>Drainage, retensi hara</td> <td>143</td> </tr> <tr> <td>Typic endoaquults</td> <td>0 – 8</td> <td>Bad</td> <td>Suitable (S3)</td> <td>Drainage, retensi hara, Texture</td> <td>146</td> </tr> <tr> <td>Typic hapludults</td> <td>8 – 15</td> <td>Good</td> <td>Suitable (S3)</td> <td>Drainage, retensi hara, Texture</td> <td>14</td> </tr> <tr> <td>Typic hapludults</td> <td>15 – 30</td> <td>Good</td> <td>Suitable (S3)</td> <td>Elevation, Topography, hara tersedia</td> <td>754</td> </tr> <tr> <td>Typic hapludults</td> <td>>30</td> <td>Good</td> <td>Not Suitable, bersyarat (N1)</td> <td>Elevation, Topography, hara tersedia</td> <td>1,574</td> </tr> <tr> <td colspan="5">Total</td> <td>2,362</td> </tr> </tbody> </table> <p>There is also topographic map indicating the elevation of Bungo Tebo Estate consist of 0- 8% and >30%. The limitation for the area is steep slope on some area. PT Rigunas Agri Utama did not open the area with steep slope > 40%. Topografi level consist of 45 – 105 m.</p>	Soil classification	Slope (%)	Drainage	Class of land	Limitation factor	Hectare	Aquic dystrudepts	0 – 8	Bad	Suitable (S3)	Drainage, retensi hara	143	Typic endoaquults	0 – 8	Bad	Suitable (S3)	Drainage, retensi hara, Texture	146	Typic hapludults	8 – 15	Good	Suitable (S3)	Drainage, retensi hara, Texture	14	Typic hapludults	15 – 30	Good	Suitable (S3)	Elevation, Topography, hara tersedia	754	Typic hapludults	>30	Good	Not Suitable, bersyarat (N1)	Elevation, Topography, hara tersedia	1,574	Total					2,362	<p>Comply</p>
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<p>4.3.2 A management strategy shall be in place for plantings on slopes</p>	<p>Bungo Tebo POM and Estate:</p>	<p>Comply</p>																																										

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Criterion / Indicator	Assessment Findings	Compliance
<p>above a certain limit (this needs to be soiland climate specific). - Minor compliance -</p>	<p>Company has establish the procedure for soil and water conservation Procedure No. AASOP-OP-1100-05.R3 dated 23 November 2016 "Konservasi Tanah dan Air". The procedure has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 -20° , and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce erosion. In addition, company also applied land cover crop in all area of replanting to prevent the soil erosion. The realization of soil and water conservation work are:</p> <ol style="list-style-type: none"> 1. Terracing, during year 2019 ytd September company has made terracing in the replanting area of 354,150 m as much as 787 ha. 2. Trench (waterways) construction ytd September 2019 were 36,454 m. 3. Maintenance "Tapak Kuda" individual platform, realization in 2018 ytd September 2019 were 297 units at imature plantation and 53 units at mature plantation. <p>During year 2019, company has planting a land cover crop (<i>Pueraria javanica</i>) 524 ha.</p> <p>Scheme Smallholder: Field visit verification: KUD Sawit Makmur Bersama <i>Hamparan 56</i>, block No.1530, area with slope on 50% of block – strategy frond stacking against contour line. Ground cover maintained; KUD Sawit Tanduk Perkasa <i>Hamparan 69</i>, block No.1275 and 1276, located on flat area, frond stacking to prevent leaching; KUD Sawit Sumay Makmur <i>Hamparan 03</i>, block No.280, area with slope on 80% of block frond stacking was not implemented consistently. Weed overgrown; KUD Barokah <i>Hamparan 22</i>, block No.434, area with slope on 50% of block – strategy frond stacking against contour line. Ground cover maintained;</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.3 A road maintenance program shall be in place.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Road maintenance program and progress made and recorded in "Monitoring Program dan Realisasi Pengerasan Jalan Manual dan Mekanis 2019". Road maintenance implementation in Bungo Tebo Estate:</p> <ul style="list-style-type: none"> - Road hardening realization in 2019 to date September 2019 total 218,746 m at mature plantation and 96,300 m at imature plantation. - Road maintenance mechanically using Grader/Road Grading in 2019 total 123,800 m (Afd I 32,200 m; Afd III 4,000 m; Afd IV 87,600 m). - During field visit and audit in PT Rigunas Agri Utama found that road condition was in good condition and well maintained. <p>Scheme Smallholder:</p> <p>Road Maintenance Program in Kebun Plasma Bungo Tebo, recorded in "Rencana dan Realisasi Perbaikan Jalan Tahun 2019". Plan for road maintenance 2019 in Division I is 116,970 m; Division II is 122,060 m; Division III is 124,940 m; total plan is 363,970 m. Actual road maintenance up to September 2019 Division I is 98,040 m; Division II is 97,600 m; Division III is 60,500 m; total 256,140 m. Therefore, total realization of road maintenance 2019 is 70.37%.</p> <p>During field visit in Kebun Plasma Bungo Tebo, shown that road condition generally in good and medium condition particularly in main road, however in collection road the condition is medium and several found in bad condition.</p> <p>Evidence of road maintenance and service can be demonstrated in "Surat Pengakuan Hutang" for example SPH No.KLO/2018/12/SPH-ALAT/060 Koperasi Sawit Sumay Makmur dated 7 Jan 2019. Contain information of heavy equipment usage and number of Hour Meter and cost of road maintenance and services. Equipment Type: Backhoe Loader; Company: PT Uniteda Arkato; Period: 1-31 Dec 2018; Location: Poros SP; 6,000 HM; Rp/HM: 300,000; total cost Rp 19,800,000.</p>	<p>Comply</p>
<p>4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground</p>	<p>Bungo Tebo POM and Estate:</p> <p>Based on semi-detailed soil survey and field observation, there is no peat soil both in Bungo Tebo Estate and scheme smallholder area.</p>	<p>Comply</p>

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Criterion / Indicator		Assessment Findings	Compliance
	cover management programme shall be in place. - Major compliance –		
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 –	Bungo Tebo POM and Estate: Based on semi-detailed soil survey and field observation, there is no peat soil both in Bungo Tebo Estate and scheme smallholder area.	Comply
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 –	Bungo Tebo POM and Estate: In procedure no. AA-SOP-OP-1100-05.R3 “Konservasi Tanah dan Air” has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 -20°, and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce soil erosion. Based on soil analysis, there is no fragile soil in PT Rigunas Agri Utama – Bunyo Tebo Estate. Based on Peta Sebaran Satuan Tanah for Bungo Tebo Estate the predominant soil type consist of: Aquic dystrodepts, Typic hapludults, Typic endoaquults.	Comply
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Bungo Tebo POM dan Estate: PT Rigunas Agri Utama – Bungo Tebo POM and supply bases have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in “Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water. The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>quality monitoring are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result shown that water quality is complies with national regulation.</p> <p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, Pheronema canescens and Bamboosa sp). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g.Pheronema canescens, Terminalia cattapa, Bamboosa sp and vetiver grass) and monitoring of water quality.</p> <p>Scheme Smallholders:</p> <p>The soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The soft weed for natural cover crop – in order to maintain micro-climate and minimize surface run-off.</p> <p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to "Memorandum Nomor: 02/EST-KLO/MEMO/X/17 dated 2 October 2017". Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p>	
<p>4.4.2</p>	<p>Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the</p> <p>Bungo Tebo POM and Estate:</p> <p>The company has developed the procedure for protection and maintain appropriate riparian under "SOP Pengelolaan Riparian" No. AA-APM-OP-1100.05.R3, it is stated that during the land clearing, area along the river shall be conserved. This was evidence during replanting, presently in Bungo Tebo estates. The</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p>	<p>required buffer zones were seen to have been established during this process and exlude from the replanting plan. The buffer zones are in places, to prevent run off, coming from nutrients and chemicals through the planting upkeep.</p> <p>Company has water source management: Identification of water source and wetland, as indicated in HCV report. The water source identified mill’s water reservoir and river. Policy to prohibit chemical application in riparian zone. Policy to prohibit fish poisoning and prohibit wood cutting in area of company plantation. No chemical-related operation on riparian area. Riparian area was marked with radius 50 meters from both side of the river as per procedure AA-KL-12-EFP Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya. The riparian restoration process in area undisturbed and disturbed area (planting area) by placing the stake, planting the local species and erosion barrier species</p> <p>Company also has Conserve natural vegetation in riparian zone and restricted to conducted replanting palm oil in riparian area. During field visit in riparian of Singoan river at Block B17f and B18a Division II Muara Bulian Estate can be shown that vegetation in riparian area has well grown including the restoration plant.</p> <p>Scheme Smallholders:</p> <p>he soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The soft weed for natural cover crop – in order to maintain microclimate and minimize surface run-off.</p> <p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to “Memorandum Nomor: 02/EST-KLO/MEMO/X/17 dated 2 October 2017”. Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p> <p>During interview and field visit to smallholder blocks at</p> <ol style="list-style-type: none"> 1. KOPERASI Sawit Sumay Makmur (Hampanan-05), Block 256, Block 257 and Block 258. 2. KOPERASI Sawit Makmur Bersama (Hampanan-77), Block 1580, Block 1590 and Block 1591. 3. KOPERASI Barokah (Hampanan-17), Block 456 and Block 457. 4. KOPERASI Sawit Tanduk Perkasa (Hampanan-56), Block 1427, Block 1429, Block 1420 and Block 1437. 	

Criterion / Indicator	Assessment Findings	Compliance																																																																							
	<p>It was explain that they have understand regarding the protection of watercourse and prohibition of chemical application near to riparian area. Therefore, agrochemical application conducted by the company Spraying Team (TUS).</p> <p>Based on field observation with sample of smallholders block visited, auditor did not found watercourses surrounding the smallholder’s blocks.</p> <p>Field visit verification at KUD Sawit Tanduk Perkasa <i>Hamparan 69</i>, block No.1725, Sayuti, located near water course, maintained buffer zone.</p>																																																																								
<p>4.4.3 Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6). - Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has prepared a procedure to manage the palm oil mill effluent, under AA-MPMOP-1400.13- R1. The process detail is from recovery tank into cooling pond, into acidification pond (anaerob bactery activation) into primary anaerob pond (decomposistion), secondary anaerobic pond. The purpose was to reduce BOD <100 ppm.</p> <p>Bunga Tebo POM has also prepared a work instruction for management of POME pond, under “Work Instruction Pengoperasian Kolam Limbah”. The fresh palm oil mill effluent has processed in order to met “Keputusan Menteri Lingkungan Hidup No. 28 – 29 tahun 2003 which stated the parameter should be within pH 6-9; BOD 5,000 mg/Liter.</p> <p>The result of monitoring of effluent especially BOD in 2019, such as:</p> <table border="1" data-bbox="667 1029 1883 1297"> <thead> <tr> <th rowspan="2">Parameter</th> <th colspan="8">Result of Monitoring (mg/l)</th> </tr> <tr> <th>Jan</th> <th>Feb</th> <th>March</th> <th>April</th> <th>May</th> <th>Jun</th> <th>Jul</th> <th>Aug</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7,12</td> <td>7,61</td> <td>6,82</td> <td>7,40</td> <td>7,5</td> <td>8,2</td> <td>8,3</td> <td>8,4</td> </tr> <tr> <td>BOD</td> <td>805</td> <td>966</td> <td>1.205</td> <td>4.020</td> <td>2.010</td> <td>810</td> <td>600</td> <td>566</td> </tr> <tr> <td>COD</td> <td>1.305</td> <td>1.952</td> <td>2.275</td> <td>6.789</td> <td>2.812</td> <td>1.516</td> <td>1.545</td> <td>1.724</td> </tr> <tr> <td>Cu</td> <td>0,160</td> <td><0,008</td> <td><0,008</td> <td>0,081</td> <td><0,002</td> <td>0,097</td> <td>0,153</td> <td>0,347</td> </tr> <tr> <td>Pb</td> <td><0,03</td> <td><0,03</td> <td><0,03</td> <td><0,03</td> <td><0,03</td> <td><0,03</td> <td><0,03</td> <td><0,03</td> </tr> <tr> <td>Zn</td> <td>0,315</td> <td>0,099</td> <td>0,024</td> <td>1,26</td> <td>0,088</td> <td>0,087</td> <td>0,642</td> <td>1,233</td> </tr> </tbody> </table> <p>The monitoring of Palm Oil Mil Effluent has been analyzed by Accredited Laboratory “UPTD Laboratorium Daerah – under Environmental Agency in Jambi Province”.</p>	Parameter	Result of Monitoring (mg/l)								Jan	Feb	March	April	May	Jun	Jul	Aug	pH	7,12	7,61	6,82	7,40	7,5	8,2	8,3	8,4	BOD	805	966	1.205	4.020	2.010	810	600	566	COD	1.305	1.952	2.275	6.789	2.812	1.516	1.545	1.724	Cu	0,160	<0,008	<0,008	0,081	<0,002	0,097	0,153	0,347	Pb	<0,03	<0,03	<0,03	<0,03	<0,03	<0,03	<0,03	<0,03	Zn	0,315	0,099	0,024	1,26	0,088	0,087	0,642	1,233	<p>Comply</p>
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	<p>From the analysis result can be shown that generally the parameter analyze has met with the standard of Land application permit.</p> <p>PT Rigunas Agri Utama has regularly reported the analysis result of POME to “Dinas Lingkungan Hidup Kabupaten Tebo” – Environmental Agency- on six (6) months bases under Report of RKL-RPL. Latest report period January – June 2019 are available and has been reported.</p>																							
<p>4.4.4 Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Mill water use per tonnage of FFB has monitored in monthly bases. Result of monitoring of mill water use per tonnage of FFB has sighted in January to September 2019.</p> <p>The following is mill water use per tonnage of FFB since January – September 2019, the budget for process water use is determined as 1.15 M³/ton FFB processed.</p> <table border="1" data-bbox="674 786 1294 1189"> <thead> <tr> <th>Month 2019</th> <th>Water consumption for FFB production (M³/Tonnage)</th> </tr> </thead> <tbody> <tr><td>January</td><td>0,89</td></tr> <tr><td>February</td><td>0,97</td></tr> <tr><td>March</td><td>1,23</td></tr> <tr><td>April</td><td>1,09</td></tr> <tr><td>May</td><td>0,81</td></tr> <tr><td>June</td><td>0,79</td></tr> <tr><td>July</td><td>0,83</td></tr> <tr><td>August</td><td>0,80</td></tr> <tr><td>September</td><td>0,76</td></tr> <tr><td>Average</td><td>0,88</td></tr> </tbody> </table> <p>PT Rigunas Agri Utama has a program to reduce water consumption, such as: recycle the water cooler turbine discharge water basin; recycle condensate water discharge water dilution; minimize duration of cleaning to be every two weeks.</p>	Month 2019	Water consumption for FFB production (M ³ /Tonnage)	January	0,89	February	0,97	March	1,23	April	1,09	May	0,81	June	0,79	July	0,83	August	0,80	September	0,76	Average	0,88	<p>Comply</p>
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<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																								

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.1 Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate:</p> <p>Estate and scheme smallholder management conduct regular census to monitor the pest infestation, prior to application of pesticide to control pest outbreak. Estate carried out monthly pest monitoring through pest census on rats and Tirathaba, leaf eating caterpillar and bagworm, and other type of pest.</p> <p>Based on record review and interview with manager estate and smallholder, there has been no application of pesticide throughout 2019. Pest such as rat – controlled through natural predator, barn owl; leaf eating caterpillar and bagworm is under control – through natural predator, nurtured and maintained the host plant such as <i>Turnera subulata</i>, <i>Antigonon</i>, etc. Company has an effort to improving the natural predator of caterpillar pest by planting host plan such as: <i>Cassia tora</i>, <i>Turnera subulata</i> and <i>Antigonon leptopus</i> along the main road and production road. To improve natural predator of rats, company has effort to introduce the barn owl and create the nest for barn owl/barn owl boxes.</p> <p>Scheme Smallholder</p> <p>Kebun Plasma Bungo Tebo refers to Procedure Pengendalian Hama dan Penyakit (AA-Plasma-PP-KS-02 dated 1 Sep 2011) for monitoring and control of Integrated Pest Management. The procedure covers pest and disease census, monitoring technique, calculation method, identification of pest (leaf eating caterpillar, rat, <i>Oryctes</i>, <i>Tira thaba</i>, and white ant). Integrated pest management has implemented by Plasma Bungo Tebo and records are maintained.</p> <p>Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Tanduk Perkasa and Koperasi Sawit Sumay Makmur have shown documents related to IPM as follows:</p> <ul style="list-style-type: none"> - “Formulir Sensus Hama Ulat Pemakan Daun” contains information of leaf eater census recapitulation. Census of leaf eater conducted each month by census team. For example census recapitulation period September 2019 in Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Tanduk Perkasa and Koperasi Sawit Sumay Makmur, shown that there was very light intense of caterpillar attack. - “Formulir Sensus Burung Hantu dan KBH” contains information of <i>Tyto alba</i> (barn owl) census and barn owl box condition. Barn owl census performed each 3 month by census team. For example census recapitulation in September 2019 in Koperasi Sawit Makmur Bersama, counted 1.01% rat attack and counted 27 of barn owl boxes; Koperasi Barokah, counted 0.37% rat attack and counted 15 of barn owl 	<p>Comply</p>

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	<p>boxes; Koperasi Sawit Tanduk Perkasa, counted 0.73% rat attack and counted 3 of barn owl boxes; Koperasi Sawit Sumay Makmur, counted 1.22% rat attack and counted 34 of barn owl boxes.</p> <p>- "Rencana dan Realisasi Penanaman Host Plant" contains information of beneficial plant/host plan in each smallholder area. e.g. in Koperasi Barokah, in March 2019 planted 8,879 plants; in July 2019 planted 8,913 plants; in September 2019 planted 8,901 plants. Koperasi Sawit Keluarga Sejahtera, in March 2019 planted 1,350 plants; in July 2019 planted 470 plants; in September 2019 planted 280 plants. Koperasi Sawit Sumay Makmur, in March 2019 planted 23,708 plants; in July 2019 planted 23,645 plants; in September 2019 planted 23,622 plants.</p> <p>"Rencana dan Realisasi Kerja Semprot Piringan Tahun 2019" contain information of plan and realization of spraying circle and path. Koperasi Sawit Sumay Makmur (858 Ha), planned 154 Ha in February and August; 704 Ha in March and September; selective spraying planned in April 264 Ha, in May 494 Ha and in June 100 Ha. Koperasi Barokahn (372 Ha) planned selective spraying in December 372 Ha; spraying circle and path in May 372 Ha and November 372 Ha. Koperasi Sawit Keluarga Sejahtera (136 Ha), circle and path spraying planned in June 136 Ha and in December 136 Ha; selective spraying planned in February 136 Ha. Based on document review all program have been realized based on the schedule.</p>	
<p>4.5.2</p>	<p>Training records of Integrated Pest Management (IPM) shall be available.</p> <p>- Minor compliance –</p> <p>Bungo Tebo Estate:</p> <p>Bungo Tebo Estate has conducted training of Integrated Pest Management (IPM) for IPM workers who performed pest and disease census and control. Latest training conducted on 09 August 2019 by Assistant HPT, attend by 18 participant. Evidence of training can be demonstrated such as attendat list and minutes of training. During interview with Foreman and census workers indicated that they have understand against integrated pest management practice.</p> <p>Scheme Smallholder</p> <p>All Koperasi in cooperation with PT Rigunas Agri Utama conducted Integrated Pest Management (IPM) training. Training activity covered: mechanism of pest and disease monitoring, census and monitoring technique, action taken, type of pest and disease, attack symptoms and its control. Evidence of training can be demonstrated in the form of training program, attendances list and training module.</p> <p>Integrated pest management training, performed on 18 Dec 2018 in Koperasi Sawit Keluarga Sejahtera,</p>	<p>Comply</p>

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		attended by 12 participants; 19 Dec 2018 in Koperasi Sawit Makmur Bersama, attended by 13 participants; on 20 Dec 2018 in Koperasi Sawit Tanduk Perkasa, attended by 17 participants; on 12 Dec 2018 in Koperasi Sawit Sumay Makmur, attended by 18 participants; on 5 Dec 2018 in Koperasi Barokah, attended by 24 participants;									
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment											
4.6.1	<p>Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate:</p> <p>The justification of pesticide used is explained under company procedure. PT Rigunas Agri Utama shows procedure of weed control - "SOP Pengendalian Gulma No.AA-APM-OP-11100.08- R1" dated 1 November 2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (Musa spp), Asystasia, etc. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application.</p> <p>Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species.</p> <p>Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output. Interview with herbicide sprayer in Afdeling III Block C18E Bungo Tebo Estate indicated that they understood the target species and active ingredients to control them. Sprayer shows knowledge on minimizing chemical impact on beneficial weed. Justification for use of pesticide is clear, and understood by workers.</p> <p>Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH. Other areas except specific area were not applied.</p> <p>Riparian area along the river also prohibit to performed spraying to minimize dan reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.</p> <p>Type of pesticide use by PT Rigunas Agri Utama, Bungo Tebo Estate and its weeds target:</p> <table border="1" data-bbox="663 1321 1834 1383"> <thead> <tr> <th>Agrochemical</th> <th>Active ingredients</th> <th>Register No.</th> <th>Weeds/Pest target</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Agrochemical	Active ingredients	Register No.	Weeds/Pest target					Comply
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		Dithane M-45 80 WP	Mancozeb	RI.010201197459	Fungi	
		Sibutox 6 GR	Tetramethyl metaldehyde	RI.01050120093491	Molusca	
		Agronil 75 WP	Chlortolonile	RI.01020120114105	Fungi	
		Gramoxone	Paraquat 200 g/l	RI.010301197436	Fern, VOP, wood, Kerisan grass	
		Metsulindo 20 WP	Metil metsulfuron 20%	RI.01030119991484	Wide leaf weeds, Stenochlaena, Cryan	
		Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170	Narrow leaf weed, Asystasia, Imperata cylindrical	
		Polydor 25 EC	Lambda sihalotrin	RI.01010120041994	Oryctes	
		Kenlon 480 EC	Triklopir 480 g/l	RI.01030120062433	Woody	
		Kenrane 288 EC	Floroksipir 20 g/l	RI.01010120103759	Legume, Asystasia	
		Amcothene 75S	Dimethyl acethyl phoporomidothioate	RI.01010119921006	Grayak Catterpillar	
		Lindomin 865 AS	Dimetil amina 865 gr/l	RI.0103011989867	Wide leaf weed	
		Gulmaron 80 WP	Diuron 80%	RI.01030119981413	Narrow leaf weed	
		Perfektan 425 EC	Dimetoat 425 gr/l	RI.01010120011583	emulgator	
		<p>Scheme Smallholder: The scheme smallholder refer to SOP "Pestisida dan Pengelolaannya No.AA-SOP-07-KLO". "SOP Pengendalian Gulma No.AA-SOP-06-KLO" defines the technical guidance for systematic weed control. Company worker team called TUS (Tim Unit Semprot) conducts spraying work at Smallholder area. Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH. Other areas except specific area were not applied. Riparian area along the river also prohibit to performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by Kebun Plasma Bungo Tebo were registered in the book of pesticides - "Komisi Pestisida" and has permit from Ministry of Agriculture.</p>				

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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 available. - Major compliance -	Bungo Tebo Estate: The Company maintains record of pesticide use in 2019. Below are the pesticide usage since January September 2019: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Agrochemical</th> <th>Active ingredients use</th> <th>Active ingredients use/ha</th> <th>Volume apply</th> <th>LD50 (oral mg/kg BW)</th> </tr> </thead> <tbody> <tr><td>Dithane M-45 80 WP</td><td>0.80 L</td><td>0.025 L</td><td>56 L</td><td>>5,000</td></tr> <tr><td>Sibutox 6 GR</td><td>0.06 L</td><td>0.0001 L</td><td>2 L</td><td>n/a</td></tr> <tr><td>Agronil 75 WP</td><td>0.75</td><td>0.025</td><td>10</td><td>5,742</td></tr> <tr><td>Gramoxone</td><td>21.83 L</td><td>0.2 L</td><td>79.10 L</td><td>612</td></tr> <tr><td>Metsulindo 20 WP</td><td>1.80 L</td><td>0.02 L</td><td>9 L</td><td>50</td></tr> <tr><td>Elang 480 SL</td><td>3,388.32 L</td><td>0.4 L</td><td>7,059 L</td><td>5,000</td></tr> <tr><td>Polydor 25 EC</td><td>205.92 L</td><td>0.15 L</td><td>429 L</td><td>2,625</td></tr> <tr><td>Kenlon 480 EC</td><td>5.60 kg</td><td>0.48 kg</td><td>112 kg</td><td>4,500</td></tr> <tr><td>Kenrane 288 EC</td><td>77.18 L</td><td>0.25 L</td><td>268 L</td><td>>5,000</td></tr> <tr><td>Amcothene 75S</td><td>24.75 kg</td><td>0.75 kg</td><td>45 kg</td><td>945</td></tr> <tr><td>Lindomin 865 AS</td><td>46.48 L</td><td>0.05 L</td><td>83 L</td><td>2,872</td></tr> <tr><td>Gulmaron 80 WP</td><td>38.00 kg</td><td>0.08 kg</td><td>190 kg</td><td>2,900</td></tr> <tr><td>Perfektan 425 EC</td><td>0.43 L</td><td>0.43 L</td><td>19 L</td><td>201</td></tr> </tbody> </table>				Agrochemical	Active ingredients use	Active ingredients use/ha	Volume apply	LD50 (oral mg/kg BW)	Dithane M-45 80 WP	0.80 L	0.025 L	56 L	>5,000	Sibutox 6 GR	0.06 L	0.0001 L	2 L	n/a	Agronil 75 WP	0.75	0.025	10	5,742	Gramoxone	21.83 L	0.2 L	79.10 L	612	Metsulindo 20 WP	1.80 L	0.02 L	9 L	50	Elang 480 SL	3,388.32 L	0.4 L	7,059 L	5,000	Polydor 25 EC	205.92 L	0.15 L	429 L	2,625	Kenlon 480 EC	5.60 kg	0.48 kg	112 kg	4,500	Kenrane 288 EC	77.18 L	0.25 L	268 L	>5,000	Amcothene 75S	24.75 kg	0.75 kg	45 kg	945	Lindomin 865 AS	46.48 L	0.05 L	83 L	2,872	Gulmaron 80 WP	38.00 kg	0.08 kg	190 kg	2,900	Perfektan 425 EC	0.43 L	0.43 L	19 L	201	Comply
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	<p>Scheme Smallholder:</p> <p>Each Koperasi has record the pesticide use each month and recorded in "Pemakaian Bahan Kimia Plasma Bungo Tebo 2019". Below are the data of pesticide use with active ingredients, LD50, area treated, amount of active ingredients applied per Ha and number of applications in each Koperasi:</p> <table border="1" data-bbox="663 555 1659 1038"> <thead> <tr> <th colspan="5">Koperasi Sawit Makmur Bersama</th> </tr> <tr> <th>Agrochemical</th> <th>Gramoxone (Paraquat 276 g/l)</th> <th>Metsulindo Metil (Metsulfuron 20%)</th> <th>Elang 480 SL (Isopropil Amina Glifosat 480 g/l)</th> <th>Kenrane (Trifluoroksipir 288 g/l)</th> </tr> </thead> <tbody> <tr> <td>LD50 Oral (mg/kg)</td> <td>612</td> <td>50</td> <td>5000</td> <td>5000</td> </tr> <tr> <td colspan="5" style="text-align: center;">2018</td> </tr> <tr> <td>Volume application</td> <td>220 ltr</td> <td>16 kg</td> <td>314 ltr</td> <td>31 ltr</td> </tr> <tr> <td>a.i. Use</td> <td>44 gr</td> <td>3 kg</td> <td>63 gr</td> <td>6 gr</td> </tr> <tr> <td>a.i. per Ha</td> <td>0.07 gr/Ha</td> <td>0.005 gr/Ha</td> <td>0.01 gr/Ha</td> <td>0.01 gr/Ha</td> </tr> <tr> <td colspan="5" style="text-align: center;">2019 (up to August)</td> </tr> <tr> <td>Volume application</td> <td>0</td> <td>0</td> <td>471 ltr</td> <td>47 ltr</td> </tr> <tr> <td>a.i. Use</td> <td>0</td> <td>0</td> <td>94 gr</td> <td>9 gr</td> </tr> <tr> <td>a.i. per Ha</td> <td>0</td> <td>0</td> <td>0.15 gr/Ha</td> <td>0.015 gr/Ha</td> </tr> </tbody> </table> <table border="1" data-bbox="663 1082 1659 1372"> <thead> <tr> <th colspan="5">Koperasi Barokah</th> </tr> <tr> <th>Agrochemical</th> <th>Gramoxone (Paraquat 276 g/l)</th> <th>Metsulindo Metil (Metsulfuron 20%)</th> <th>Elang 480 SL (Isopropil Amina Glifosat 480 g/l)</th> <th>Kenrane (Trifluoroksipir 288 g/l)</th> </tr> </thead> <tbody> <tr> <td>LD50 Oral (mg/kg)</td> <td>612</td> <td>50</td> <td>5000</td> <td>5000</td> </tr> <tr> <td colspan="5" style="text-align: center;">2018</td> </tr> <tr> <td>Volume application</td> <td>130 ltr</td> <td>9 kg</td> <td>186 ltr</td> <td>19 ltr</td> </tr> </tbody> </table>	Koperasi Sawit Makmur Bersama					Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluoroksipir 288 g/l)	LD50 Oral (mg/kg)	612	50	5000	5000	2018					Volume application	220 ltr	16 kg	314 ltr	31 ltr	a.i. Use	44 gr	3 kg	63 gr	6 gr	a.i. per Ha	0.07 gr/Ha	0.005 gr/Ha	0.01 gr/Ha	0.01 gr/Ha	2019 (up to August)					Volume application	0	0	471 ltr	47 ltr	a.i. Use	0	0	94 gr	9 gr	a.i. per Ha	0	0	0.15 gr/Ha	0.015 gr/Ha	Koperasi Barokah					Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluoroksipir 288 g/l)	LD50 Oral (mg/kg)	612	50	5000	5000	2018					Volume application	130 ltr	9 kg	186 ltr	19 ltr	
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		a.i. Use	26 gr	1.8 kg	37 gr	4 gr			
		a.i. per Ha	0.07 gr/Ha	0.005 gr/Ha	0.10 gr/Ha	0.01 gr/Ha			
		2019 (up to August)							
		Volume application	0	0	93 ltr	9 ltr			
		a.i. Use	0	0	18.6 gr	1.8 gr			
		a.i. per Ha	0	0	0.21 gr/Ha	0.04 gr/Ha			
		Koperasi Sawit Tanduk Perkasa							
		Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluoroksipir 288 g/l)			
		LD50 Oral (mg/kg)	612	50	5000	5000			
		2018							
		Volume application	253 ltr	18 kg	369 ltr	37 ltr			
		a.i. Use	50.60 gr	3.60 kg	73.80 gr	7.40 gr			
		a.i. per Ha	0.07 gr/Ha	0	0.1 gr/Ha	0.01 gr/Ha			
		2019 (up to August)							
		Volume application	0	0	554 ltr	55 ltr			
		a.i. Use	0	0	111 gr	11 gr			
		a.i. per Ha	0	0	0.15 gr/Ha	0.01 gr/Ha			
		Koperasi Sawit Sumay Makmur							
		Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluoroksipir 288 g/l)			

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Criterion / Indicator		Assessment Findings					Compliance
	LD50 Oral (mg/kg)	612	50	5000	5000		
	2018						
	Volume application	300 ltr	21 kg	429 ltr	43 ltr		
	a.i. Use	60 gr	4.2 kg	85.80 gr	8.60 gr		
	a.i. per Ha	0.68 gr/Ha	0.048 gr/Ha	0.975 gr/Ha	0.02 gr/Ha		
	2019 (up to August)						
	Volume application	0	0	644 ltr	64 ltr		
	a.i. Use	0	0	128.8 gr	12.8 gr		
	a.i. per Ha	0	0	0.14 gr/ha	0.03 gr/Ha		
	Koperasi Sawit Keluarga Sejahtera						
	Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluorokspir 288 g/l)		
	LD50 Oral (mg/kg)	612	50	5000	5000		
	2018						
	Volume application	48 ltr	3 kg	68 ltr	7 ltr		
	a.i. Use	9.6 gr	0.6 kg	13.6 gr	1.4 gr		
	a.i. per Ha	0.11 gr/Ha	0.007 gr/Ha	0.155 gr/Ha	0.003 gr/Ha		
	2019 (up to August)						
	Volume application	0	0	68 ltr	6 ltr		
	a.i. Use	0	0	13.6	1.2		
	a.i. per Ha	0	0	0.155	0.002 gr/Ha		

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.3 Any use of pesticides shall be minimized 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 Indonesia Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate:</p> <p>Based on the company SOP, there is no prophylactic use of pesticide (not allowed). Estate and scheme smallholder conduct annual census to monitor the pest infestation, prior to application of pesticide to control the outbreak. Estate carried out monthly pest monitoring through pest census on rats and tirathaba, leaf eating caterpillar and bagworm, and other type of pest.</p> <p>Based on record review and interview with manager estate and plasma, there has been no application of pesticide throughout 2014. Pest such as rat – controlled through natural predator, barn owl; leaf eating caterpillar and bagworm is under control – through natural predator, nurtured and maintained the host plant such as <i>Turnera subulata</i>, <i>Antigonon</i>, etc. Company has an effort to improving the natural predator of caterpillar pest by planting host plan such as: cassia tora, turnera subulata and <i>Antigonon leptopus</i> along the main road and production road. To improve natural predator of rats, company has effort to introduce the barn owl and create the nest for barn owl/barn owl boxes.</p> <p>Scheme Smallholder:</p> <p>Based on the company procedure, prophylactic use of pesticide is not allowed. Based on review to pesticide and herbicide use record, interview with smallholders – it was confirmed no prophylactic use of pesticide. Scheme Smallholder management conduct regular census to monitor the pest infestation, prior to application of pesticide to control pest outbreak. Estate carried out monthly pest monitoring through pest census on rats and <i>Tirathaba</i>, leaf eating caterpillar and bagworm, and other type of pest.</p> <p>Based on record review and interview with manager of Kebun Plasma Bungo Tebo and Smallholder farmers, there has been no application of pesticide throughout 2019. Pest such as rat – controlled through natural predator, barn owl; leaf eating caterpillar and bagworm is under control – through natural predator, nurtured and maintained the host plant such as <i>Turnera subulata</i>, <i>Antigonon</i> and <i>Casia cobanensis</i>.</p>	<p>Comply</p>
<p>4.6.4 The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed</p>	<p>Bungo Tebo Estate:</p> <p>Bungo Tebo Estate has no longer use paraquat since October 2019. According to record of paraquat usage “Pemakaian Gramoxone 2019” shown that latest paraquat usage was in May 2019 as much as 7.2 L for semprot anak kayu (hard weeds control) at Block D08e Afd IV. Total paraquat usage since January – May</p>	<p>NC #1679639-201809-N3</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>2019 at Bungo Tebo Estate was 79.10 L. During observation at agrochemical warehouse can be prove that there is no longer Gramoxone (paraquat) stock at warehouse.</p> <p>Asian Agri Top management has issued the letter (email) on 20 August 2019 to all Plantation Regional Head which stated that paraquat usage maximum until the end of September 2019 and the stock of paraquat by end of September 2019 must be zero (0).</p> <p>Scheme Smallholder: Based on record of agrochemical uses, there is no paraquat use in 2019 in whole Plasma Bungo Tebo area. The last uses of paraquat is in 2018, i.e. Koperasi Sawit Makmur Bersama 220 ltr; Koperasi Sawit Tanduk Perkasa 253 ltr; Koperasi Sawit Keluarga Sejahtera 48 ltr; Koperasi Barokah 130 ltr; Koperasi Sawit Sumay Makmur 300 ltr.</p> <p>Confirmed during field visit and interview with smallholders that no paraquat used in smallholders area since 2018.</p>	<p>Closed on 24 October 2019</p>
<p>4.6.5</p> <p>Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate:</p> <p>Company provides limited pesticide training for sprayers. Training on limited pesticide use “Pelatihan Pestisida Terbatas” conducted on 11 September 2019, attended by 81 participants from PT RAU and PT IIS, 12 sprayer workers from Bungo Tebo Estate. Training conducted incorporated with Syngenta and “Komisi Pengawas Pestisida dan Pupuk” Provinsi Jambi. Another training of limited pesticide use carried out in 26 August 2015 by “Komisi Pengawas Pupuk dan Pestisida Pemerintah Provinsi Jambi”. Sample seen on certificate “Sertifikat Pengguna Pestisida Terbatas” No. 08/KP3/V/2018 on behalf Delyani Dated 21 April 2018, No. 08/KP3/V/2018 on behalf Rosmiyati dated 8 May 2018.</p> <p>During interview with spraying workers in Division III Block C18e (Rina Widia, Nia Khairani, Rosmiati, Daliani, Nuriati) indicated that they have understood pesticide application in accordance with application guidelines in product label. Pesticide operator understood pesticide usage procedure, risk of pesticide use, active ingredient, pesticide dosage and technique how to apply pesticide in the field. During field visit they can demonstrated the adequate skill and understanding. Appropriate PPE has been provided by company and used by spraying workers such as: Apron, leather and rubber hand gloves, respiratory masker, safety goggles, head cover and rubber boot.</p>	<p>Comply</p>

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	<p>Scheme Smallholder:</p> <p>At Kebun Plasma Bungo Tebo, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesticide training "Pelatihan Pestisida Terbatas" by PT. Syngenta Indonesia for the worker: Yuliansyah, Ahmad Ansri, Bagas Ade Bramantya, Adi Putra Sinaga, Ridwansyah Putra, Adi Saputra, Hendri, Nia Herani Zega, Nurhuda, Pinaria Laia and Rini Widia on 11 Sept 2019. Attendance list available.</p> <p>Confirmed during field visit and interview with smallholders that spraying activity conducted only by special team 'TUS' from the company workers.</p> <p>Field visit verification:</p> <p>KUD Sawit Makmur Bersama</p> <p>Hamparan 56, block No.1529 and 1530, did not performed weed spraying themselves – using service of "Team Unit Semprot" from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p> <p>KUD Barokah</p> <p>Hamparan 22, block No.434, did not performed weed spraying themselves – using service of "Team Unit Semprot" from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p> <p>KUD Sawit Tanduk Perkasa</p> <p>Hamparan 69, block No.1275 and 1276, did not performed weed spraying themselves – using service of "Team Unit Semprot" from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p> <p>KUD Sawit Sumay Makmur</p> <p>Hamparan 03, block No.278, 279 and 280, did not performed weed spraying themselves – using service of "Team Unit Semprot" from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p>	
<p>4.6.6</p>	<p>Storage of pesticides shall be according to recognised best practices. All pesticides</p> <p>Bungo Tebo Estate and Scheme Smallholder:</p> <p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertilizer and</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).</p> <p>- Major compliance -</p>	<p>other chemicals. Pesticides storage is provided in central storage. Agrochemicals storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides are provided including boots, apron, safety glass, respiratory mask and hand gloves.</p> <p>The company already had a Pesticides warehouse and pesticide containers washing and bathing places for the sprayers. Based on a field visit to the Pesticides Warehouse Muara Bulian Estate on 25 May 2019, it was found that:</p> <ul style="list-style-type: none"> - Permanent Buildings, - A good ventilation, - Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", - eye wash shower, first aid box, PPE and Fire extinguisher are provided. - PPE room <p>Operation control:</p> <ul style="list-style-type: none"> - MSDS are available for all types of existing pesticides - The pesticide management and safety instructions are available - A package management/ used pesticide package is available - Water wash of pesticides containers collected in "spillage trap" - The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>A package management / used pesticide package:</p> <ul style="list-style-type: none"> - Pesticide packages were clean washed in a wash basin, then, it was dried in a provided place. - Dried packages were stored in temporary warehouse before being taken / sent by a third party who has a license. 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field. The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008. The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p> <p>All empty pesticides container has properly managed by sending it to temporary hazardous waste storage. The company has licensed temporary hazardous waste storage, where all hazardous waste from all estates and mills has collected.</p> <p>The disposal hazardous waste has delivered to licensed processor using licensed transporter. Storage keeper maintains the balance of incoming and outgoing hazardous waste.</p> <p>Smallholder Bungo Tebo doesn't have a storage of pesticide. All activity related to chemical usage was performed by PT Rigunas Agri Utama – Bungo Tebo Estate.</p> <p>Scheme Smallholder:</p> <p>Pesticides application such as weed control, circle and path spraying in scheme smallholder's area are conducted by company worker, "Team Unit Semprot" (TUS). Storage of pesticides are handled by Bungo Tebo Estate store keeper. The disposals of empty chemical container were using the same facility with Bungo Tebo Estate and Mill.</p> <p>Pesticides/Herbicides containers for Smallholders application are kept located in Temporary Hazardous Waste of Bungo Tebo Estate. Records of handover chemical containers in three monthly basis. Based on document "Lembar Neraca Limbah B3", total of chemical containers as follow:</p> <ol style="list-style-type: none"> 1. Jan-Mar 2019. Total chemical containers from Smallholders is 95 pieces. Ex-pesticides cans 48 pieces. 2. Apr-Jun 2019. Total chemical containers from Smallholders is 39 pieces. Ex-pesticides cans 3 pieces. 3. Jul-Sep 2019. Total chemical containers from Smallholders is 64 pieces. Ex-pesticides cans 7 pieces. 	
<p>4.6.7</p>	<p>Application of pesticides shall be by proven methods that</p> <p>Bungo Tebo Estate and Scheme Smallholder:</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>minimize risk and negative impacts.</p> <p>- Minor compliance -</p>	<p>Application of pesticides was following SOP of Pesticides Management – “Pestisida dan Pengelolaannya” (AA-APM-OP-1100.11-R1) Chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE. Based on interview with spraying workers of Bungo Tebo Estate, they know how to handle pesticide during storage, mixing, usage, and how to conduct first aid for pesticide poisoning.</p> <p>Based on field visit to Bungo Tebo Estate and Smallholder, spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre- mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP).</p> <p>Nozzle calibration conducted regularly and recorded – evident.</p> <p>Sprayers and spraying supervisor are trained with limited pesticide training, best management practice for weed control, spraying techniques, using PPE and received regular medical check up. Clean water and soap on the field are provided for sprayer. Supervisor was equipped with first aid kit.</p> <p>At scheme smallholder’s blocks, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesticide training “Pelatihan Pestisida Terbatas Pakai” by PT. Syngenta Indonesia for 18 worker on 11 September 2019. Certificate of training also available.</p> <p>Confirmed during interview with sample of smallholders visited, it was clearly explain that herbicides/pesticides application for smallholders block is conducted by Spraying Team (TUS) which provided by the company. Smallholders did not apply herbicides/pesticides by their own.</p>	
<p>4.6.8</p> <p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within</p>	<p>Bungo Tebo Estate and Scheme Smallholder:</p> <p>There is no aerial application of pesticide by PT Rigunas Agri Utama, both at the company owned plantation and the scheme smallholder plantation.</p>	<p>Not applicable N/A</p>

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reasonable time prior to application. - Major compliance -		
4.6.9 Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available. - Minor compliance -	<p>Bungo Tebo Estate: Agrochemicals have been applied and handled by trained spraying workers who have received usage of limited pesticide training. Training record on handing of pesticides, such as:</p> <ul style="list-style-type: none"> - List of attendance on training of pesticides handling dated 11th September 2019, was attended by 56 workers. Trainer: Mrs Mona Budhiana, SP (supplier – PT Syngenta). - Refresh training on first aid dated 26th September 2019, was attended by 25 workers. Training Dr Yudi Candra (company doctor). <p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area.</p> <p>Interview with spraying workers in Bungo Tebo Estate can be demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Scheme Smallholder: At scheme smallholder’s blocks, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesicide training “Pelatihan Pestisida Terbatas Pakai” by PT. Syngenta Indonesia for 18 workers on 11 September 2019. Certificate of training also available.</p>	Comply

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	<p>Confirmed during interview with sample of smallholders visited, it was clearly explain that herbicides/pesticides application for smallholders block is conducted by Spraying Team (TUS) which provided by the company. Smallholders did not apply herbicides/pesticides by their own.</p> <p>Field visit verification:</p> <p>KUD Sawit Makmur Bersama Hampan 56, block No.1529 and 1530, did not performed weed spraying themselves – using service of “Team Unit Semprot” from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p> <p>KUD Barokah Hampan 22, block No.434, did not performed weed spraying themselves – using service of “Team Unit Semprot” from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p> <p>KUD Sawit Tanduk Perkasa Hampan 69, block No.1275 and 1276, did not performed weed spraying themselves – using service of “Team Unit Semprot” from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p> <p>KUD Sawit Sumay Makmur Hampan 03, block No.278, 279 and 280, did not performed weed spraying themselves – using service of “Team Unit Semprot” from PT. Rigunas Agri Utama and cooperative; however, there was deduction from FFB sales.</p>	
<p>4.6.10</p>	<p>Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated.</p> <p>- Minor compliance -</p> <p>Bungo Tebo Estate:</p> <p>SOP for proper disposal of pesticide waste material was described in “Penanganan Limbah Industri B-3 AA-KL-06-EFP” dated 1 November 2008. Pesticide waste was reuse as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store according to the procedure. The company has licensed temporary hazardous waste storage where all</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>empty pesticide containers from agrochemical storage collected. The storage has obtained the license from Tebo Regent.</p> <p>Training on handling of pesticides waste has been performed, e.g: List of attendance on training of pesticides handling dated 11th September 2019, was attended by 56 workers. Trainer: Mrs Mona Budhiana, SP (supplier – PT Syngenta).</p> <p>Based on interview with workers in temporary storage of pesticides waste has demonstrated fully understood on handling of pesticides waste.</p> <p>Scheme Smallholder:</p> <p>At scheme smallholder’s blocks, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Smallholders did not apply herbicides/pesticides by their own.</p> <p>Pesticides/herbicides waste are collected and store at temporary hazardous waste storage (TPS Limbah B3), located in same place with Estate storage.</p>	
<p>4.6.11 Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate:</p> <p>PT Rigunas Agri Utama has conducted the special medical check-up for pesticides operator, as per document of “Laporan Rekapitulasi Global MCU karyawan (KBT Semprot, Pupuk Gundang)” conducted on June 2019 by Pramita Laboratory, attended by 64 workers.</p> <p>Based on interview with the pesticides operator confirmed that the result of MCU has communicated and if there any follow-up treatment needed has implemented by the company.</p> <p>Scheme Smallholders:</p> <p>At scheme smallholder’s blocks, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted Medical Check Up for the spraying workers collaborating with Pramita Laboratory. Total of 64 workers who handle chemical and spraying for Estate and Smallholders have been participated in medical check up on June 2019. The medical result showing that no sign of intoxication or detriment effect on the worker health, therefore no follow-up treatment needed.</p> <p>During field visit to smallholder’s blocks, there is no herbicides applied..</p>	<p>Comply</p>

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<p>4.6.12 Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate and Scheme Smallholder:</p> <p>Bungo Tebo Estate requested the female sprayer and fertilizer applicator to participate in pregnancy test in monthly bases. The female worker tested with pregnancy test pack by midwife in company clinic, on regular basis.</p> <p>Data seen:</p> <ul style="list-style-type: none"> – Report of Pregnancy test for month September 2019, attended by 128 female workers. The result are negative indicator in pregnant, e.g: Mrs Siti Rahmah (spraying applicator), Mrs Hariya (fertilizer applicator), Mr Asiah (spraying applicator) <p>Confirmed during interview, screening carried out by midwife, worker understood the screening for their own health and safety – no objection, there was no case of pregnant/breastfeeding female worker doing spraying work.</p> <p>At scheme smallholder’s blocks, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted regular pregnancy screening (test pack with midwife at company clinic) for the female worker in monthly basis. Based on pregnancy test in July and August 2019, total 60 female herbicides operator was negative (not pregnant). These 60 female herbicides operator working for Estate and Smallholders.</p>	<p>Comply</p>
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>		
<p>4.7.1 A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>There was no any changed of OHS policy since last surveillane.</p> <p>The health and safety policy stated under “Kebijakan Perusahaan” signed by Top Management on 1st December 2014 – written in Bahasa Indonesia. In chapter 4 was mentioned: to determine measurable objective and target to prevent accident and occupational disease for all worker and other interested parties, through continuous improvement”.</p> <p>The policy has disseminated to all workers.</p> <p>PT Rigunas Agri Utama has also prepared the procedure for OHS management and monitoring, such as:</p>	<p>Comply</p>

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	<ol style="list-style-type: none"> 1. SOP Identifikasi Bahaya Penilaian Resiko dan Penentuan Pengendalian AA-SMK3-1101.02-R0 dated 1 May 2017 2. SOP Investigasi Kecelakaan Kerja AA-SMK3-1101.01-R0 dated 1 May 2017 3. SOP Kesiagaan Tanggap Darurat AA-EMS-820-PR dated 5 April 2017 4. SOP Pengendalian Kebakaran Lahan AA-KL-14-EFP dated 5 May 2013, described the mechanism of handling fire. 5. SOP Pengendalian Kebakaran di Pabrik, Kantor, dan Perumahan AA-KL-15-EFP dated 1 December 2010 6. SOP Pengendalian Tumpahan B3 dan Limbah B3 AA-KL-16-EFP dated 1 December 2010 7. SOP Pengendalian Tanggap Darurat Boiler AA-KL-17-EFP dated 1 December 2010 8. SOP Pengendalian Gempa Bumi, Banjir, dan Tanah Longor AA-KL-18 - EFP dated 1 December 2010 9. Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting). <p>Job safety analysis for working in confined space (e.g. cleaning of storage tank), working at height, welding and other critical area. Work permit system and job safety analysis was established and implemented for these works.</p> <p>There was noted that measurement of adequacy of oxygen and availability of dangerous gas were required before entering confined space and it was mentioned in the Job safety analysis; the portable gas detector was sighted during this audit.</p> <p>Scheme Smallholder:</p> <p>Policy for health and safety have been established at each smallholder cooperative/KOPERASI, including for five smallholders cooperative sample during this assessment.</p> <p>The policy stated "Menerapkan dan memelihara sistem manajemen lingkungan, sosial, keselamatan pangan, kesehatan dan keselamatan kerja terpadu. Mencegah pencemaran lingkungan, kecelakaan dan penyakit akibat kerja terhadap pekerja. Mengintegrasikan isu lingkungan, sosial, kesehatan dan keselamatan kerja dalam kegiatan koperasi serta mengadopsi teknologi terbaik yang tersedia.</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Mengkomunikasikan kebijakan ini kepada setiap pemangku kepentingan dan menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang kesehatan dan keselamatan kerja” – to implement and maintain an integrated environment, social, food security, health and safety management system; To prevent environmental pollution and work related disease to workers; Integrating issues on environment, social, health and safety into cooperative activities; To communicate the policy and to provide sufficient information to all stakeholders, in accordance to regulation for environment, social, health and safety.</p>	
<p>4.7.2 A documented risk assessment shall be available and its implementation shall be recorded. - Major compliance -</p>	<p>Bungo Tebo Estate and POM: PT Rigunas Agri Utama-Bungo Tebo Estate has prepared a procedure for risk assessment. The risk assessment method was calculating exposure x frequency x severity. Bungo Tebo Estate and Bungo Tebo POM have documented in form HIRADC, date of last review 8th January 2019. The risk acceptance level, have been established for each risk score tier. The risk assessment has covered for all activities in Estate and Mill, such as: land clearing, harvesting, transport FFB, manuring, spraying, weighbridge, grading FFB, sterilizer station, pressing station, engine room, boiler station, workshop, office activities.</p> <p>Scheme Smallholder: Risk Assessment (HIRAC) for Smallholders cooperative made by cooperative secretary and assisted by the company. This risk assessment approved by Cooperative Chairman. Content of risk assessment are similar to all smallholders cooperative, where the main activities applied in smallholders blocks being consider within the risk assessment document. In example: HIRAC KOPERAS SAWIT MAKMUR BERSAMA, KOPERASI SAWIT KELUARGA SEJAHTERA, KOPERASI Sawit Sumay Makmur, KOPERASI Barokah and KOPERASI Sawit Tanduk Perkasa, dated 14 January 2019. This HIRAC made by Cooperative Secretary and approved by Cooperative Chairman. Activities coverage on HIRAC for Smallholders are FFB loading at blocks and unloading FFB's at Mill; Applying Fertilizer at blocks; Applying herbicides (by spraying team); Harvesting and Pest Control (particularly Elephant disruption).</p>	<p>Comply</p>
<p>4.7.3 Records of Occupational Health and Safety (OHS) program (see</p>	<p>Bungo Tebo POM and Estate:</p>	<p>Comply</p>

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<p>4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</p> <p>- Major compliance -</p>	<p>Record on implementation of OHS program has demonstrated including the PPE training based on HIRAC document, such as:</p> <ul style="list-style-type: none"> - PPE use monitoring (daily): "Monitoring Kondisi Alat Pelindung Diri" for fertilizer applicators dated 17 and 18 September 2019 location in division 1, there was reported that all found to use hat, goggle, respirator, fabric hand glove, rubber hand glove, apron, rubbers boot (OK) - Fire hydrant inspection on 3rd September 2019, covering for 5 hydrant points and hydrant hose box) in Bungo Tebo POM; result reported OK - Fire extinguisher inspection on 3rd September 2019; reported OK - First aid kit inspection location in Bungo Tebo Mill dated 7th October 2019, reported OK. - License for heavy equipment operator, e.g: <ul style="list-style-type: none"> • License of "Sertifikat Pembinaan dan Pengujian Lisensi K3 Operator Pesawat Uap Kelas I" No.690/PNK3-PUBT/OB-I/VII/08 nama Jimmer Hutagalung" dated 7 July 2008. • License of "Lisensi K3 Operator Pesawat Uap No.P.08.690-OPK3-PUBT-B.I/VI/2013 nama Jimmer Hutagalung" • License of "Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Bidang Operator Pesawat Uap Kelas 2 No.Ser.656-OPK3-PUBT-B.II/VI/2013 nama Suwito" dated 24 June 2013. • License of "Lisensi K3 Operator Pesawat Uap No. 656-OPK3-PUBT-B.II/VI/2013 nama Suwito" • License of "Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Bidang Pesawat Tenaga dan Produksi Operator K3 Diesel No.Ser.13.132/OP.D.K3/PTP/V/2013 nama Kadri" • License of "Sertifikat Pembinaan dan Pengujian Lisensi K3 Operator Pesawat Uap Kelas I No.688/PNK3-PUBT/OB-I/VII/08 nama Darmawansyah" • License of "Lisensi K3 Operator Pesawat Uap No.P-08.688/PNK3-PUBT/OB-I/VII/08 nama Darmawansyah" - Based on interview with operator in Mill and workers in division 4 and I, they confirmed that PT Rigunas Agro Utama has provided PPE for all workers, e.g: Record of provision of safety shoes for operator in sterilizer station, pressing station and engine room dated 21st January 2019. 	

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	<p>Opportunity For Improvement: PT Rigunas Agri Utama has established procedures for providing PPE, for example: safety shoes have been given to operators at Bunga Tebo POM once a year. Based on interviews with workers in the Gradding Area, Sterilizer Station and Pressing Station, there is confirmation that the safety shoes provided and currently the condition is not proper and has been one years old.</p> <p>Scheme Smallholder: Smallholder sample during this audit are KOPERASI SAWIT KELUARGA SEJAHTERA (SP-5), KOPERASI Sawit Sumay Makmur (SP-1), KOPERASI Sawit Makmur Bersama (SP-5), KOPERASI Barokah and KOPERASI Sawit Tanduk Perkasa (SP-7). Each smallholder cooperative has OHS Management Program Year 2019. The OHS program contains of Minimizing Risk of Occupational Accident Causes (including training for First Aider/Mandor and PPE used); Ensuring of Emergency Response Team is working; Administration Risk Control. Target of each program will be done by December 2019.</p> <p>Implementation record against its program is PPE handover for each cooperative. Evidence seen as follow:</p> <ol style="list-style-type: none"> 1. KOPERASI SAWIT KELUARGA SEJAHTERA. PPE (helmet, goggle, sickle cover) given to 12 smallholders dated on 11 December 2018 and 4 July 2019. 2. KOPERASI SAWIT SUMAY MAKMUR. PPE (helmet, goggle, sickle cover) given to 25 smallholders dated on 16 December 2018 and 4 July 2019. 3. KOPERASI SAWIT MAKMUR BERSAMA. PPE (helmet, goggle, sickle cover) given to 25 smallholders dated on 10 December 2018 and 15 July 2019. 4. KOPERASI BAROKAH. PPE (helmet, goggle, sickle cover) given to 20 smallholders dated on 12 December 2018 and 5 July 2019. 5. KOPERASI SAWIT TANDUK PERKASA. PPE (helmet, goggle, sickle cover) given to 25 smallholders dated on 19 December 2018 and 8 July 2019. <p>Field visit verification: KUD Sawit Makmur Bersama</p>	

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	<p>Hamparan 56, block No.1529 and 1530, harvest themselves and they are using PPE during harvesting: helmet, goggle, gumboot, and sickle cover. The PPE sighted during field visit.</p> <p>KUD Barokah</p> <p>Hamparan 22, block No.434, harvest themselves and they are using PPE during harvesting: helmet, goggle, gumboot, and sickle cover. The PPE sighted during field visit.</p> <p>KUD Sawit Tanduk Perkasa</p> <p>Hamparan 69, block No.1275 and 1276, applies fertilizer themselves and they are using PPE during harvesting: masker, hand glove, gumboot. The PPE sighted during field visit.</p> <p>KUD Sawit Sumay Makmur</p> <p>Hamparan 03, block No.278, 279 and 280, applies fertilizer themselves and they are using PPE during harvesting: masker, hand glove, gumboot. They also perform harvest and pruning themselves and they are using PPE during harvesting: helmet, goggle, gumboot, and sickle cover.</p> <p>The PPE sighted during field visit.</p>	
<p>4.7.4</p> <p>The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has appointed the PIC to implementation of OHS policy and program, data verified:</p> <ul style="list-style-type: none"> - OHS committee has registered to Manpower Agency in Jambi Province as per Letter of Degree 560/434/UPTD II/Nakertrans 3.1/III/2019 issued by UPTD Balai Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi dated September 2019. <p>Organization structure of OHS committee:</p> <p>Head: Yudiansyah (Head Assistant of Plantation)</p> <p>OHS expert (Secretary): Rico Santoso Pakpahan</p> <ul style="list-style-type: none"> - Letter of Degree of OHS expert no KEP.2964/NAKER-BINWASK3/IV/2017, issued by Menteri Ketenagakerjaan Republik Indonesia, namely Mr Rico Santoso Pakpahan, dated 18th April 2017 valid until 3 years. - OHS committee conducted regularly meeting (monthly), e.g: last meeting dated 13th September 2019, agenda: OHS issues, review on incidents report (if any), review on implementation the risk assessment. 	<p>Comply</p>

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	<p>Report of OHS performance has conducted in 3 months bases submitted to Manpower Agency in Jambi Provinsi for period July to September 2019, reported on 7th October 2019 that was received by Mr Asrul (Administration Staff in Manpower Agency in Jambi Province).</p> <p>Scheme Smallholder: Each cooperative appointed secretary to act as safety officer, as follow:</p> <ul style="list-style-type: none"> - KOPERASI SAWIT KELUARGA SEJAHTERA appointed Mr. Inwiyah as Responsible Person to Monitor OSH. Refer to Letter of Assignment "Surat Keputusan Pengurus Koperasi Sawit Keluarga Sejahtera No: 09/KUD-SKS/I/2019, dated 7 January 2019. The latest OSH meeting was conducted on 3/7/2019; 5/8/2019 and 6/9/2019. - KOPERASI Sawit Sumay Makmur appointed Mr. Daman Manuri as Responsible Person to Monitor OSH. Refer to Letter of Assignment "Surat Keputusan Pengurus Koperasi Sawit Sumay Makmur No: 10/KUD-SSM/I/2019, dated 8 January 2019. The latest OSH meeting was conducted on 3/7/2019; 6/8/2019 and 3/9/2019. - KOPERASI Sawit Makmur Bersama appointed Mr. Dahrul Batubara as Responsible Person to Monitor OSH. Refer to Letter of Assignment "Surat Keputusan Pengurus Koperasi Sawit Makmur Bersama No: 10/KUD-SMB/I/2019, dated 7 January 2019. The latest OSH meeting was conducted on 3/7/2019; 6/8/2019 and 3/9/2019. - KOPERASI Barokah appointed Mr. Badui as Responsible Person to Monitor OSH. Refer to Letter of Assignment "Surat Keputusan Pengurus Koperasi Barokah No: 13/KUD-BR/I/2019, dated 7 January 2019. The latest OSH meeting was conducted on 5/7/2019; 5/8/2019 and 2/9/2019. - KOPERASI Sawit Tanduk Perkasa appointed Mr. Ahyar as Responsible Person to Monitor OSH. Refer to Letter of Assignment "Surat Keputusan Pengurus Koperasi Sawit Tanduk Perkasa No: 10/KUD-STP/I/2019, dated 7 January 2019. The latest OSH meeting was conducted on 5/7/2019; 6/8/2019 and 10/9/2019. 	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5 A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has prepared the procedure for emergency and work accidents under "Prosedur Kesiagaan dan Tanggap Darurat No.AA-EMS-820-PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA-KL-18-EFP" dated 1st December 2010, for earthquake, flood and landslide;</p> <p>PT Rigunas Agri Utama has established the emergency response and preparedness team as per "Struktur Organisasi Tanggap Darurat", updated on 17th April 2019. Team leader is Mr Yudiansyah (Head Assistant of Plantation).</p> <p>License for first aider as per "Surat Keputusan Kepala Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Tebo No.560/107/PK/Sosnakertrans/2014 tentang Pengesahan Petugas Pertolongan Pertama pada Kecelakaan PT. Rigunas Agri Utama – Bungo Tebo atas nama Fadli Amd.Kep." dated December 2014.</p> <p>Report on monitoring of first aid kit and first aid box (monthly), e.g: dated 2nd September 2019, location in office and engine room station. The result reported OK.</p> <p>Scheme Smallholder:</p> <p>Emergency and work accident procedure available under: "Prosedur Kesiagaan dan Tanggap Darurat No.AA-EMS-820-PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA-KL-18-EFP" dated 1 December 2010, for earthquake, flood and landslide. This emergency procedure also applicable for smallholder's scheme.</p> <p>Smallholder's cooperative has assigned responsible person to monitor OSH, including monitoring for First Aid inspection in three monthly basis. In example:</p> <ol style="list-style-type: none"> 1. KUD Sumay Makmur. First Aid box was inspected on 14/01/2019; 19/04/2019 and 15/07/2019. 2. KUD Barokah. First Aid box was inspected on 14/01/2019; 19/04/2019 and 15/07/2019. <p>First Aid training for smallholders cooperative and responsible person at each cooperative conducted on 11 June 2019 (attended by 15 representatives) and 23 July 2019 (12 representatives).</p>	<p>Comply</p>

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<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3). - Minor compliance –</p>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has provided medical care for all mill and estate workers. If there was unhealthy worker, company clinic is available inside the estate area. All worker both in mill and estate were covered by BPJS Kesehatan (medical insurance) and BPJS Ketenagakerjaan (social insurance). Records of BPJS Kesehatan and BPJS Ketenagakerjaan member list are available. The company clinic has registered in Healthy Agency in Tebo Regency, data verified: – Operation permit for company clinic under Surat Izin Penyelenggaraan Klinik Rawat Jalan Pelayanan Medik Dasar No. 445/01/SIK/KPMD-PPT/2015, dated 16th February 2015 valid until 16th February 2020 – Permit to doctor on practices based Surat Ijin Prakterk Dokter nomor 446/09/DU/DPM-PTSP-K.UKM/2016 namely dr. Arde Hidayat, dated 4th April 2016 valid until 24th February 2021. – Certificate on training of Hiperkes (paramedical) under Sertifikat Hiperkes nomor 19.672/PM-VII/15 nemaly Mrs Sari Afdlina Gulton, AM.Keb, dated August 2015. During ASA-4 in October 2019, PT Rigunas Agri Utama has demonstrated the medical insurance (BPJS) has covered for all employee, Data seen: • Payment record for BPJS Kesehatan (social insurance); month September 2019, reference number: 191001310967, IDR XX,927,090 via Mandiri Bank, covered for all workers in Bungo Tebo Estate (total workers: 262). Status is Paid • Payment record for BPJS Ketengakerjaan (incidences record); month September 2019; total payment IDR XX,523,337 via Mandiri Bank, covered for all workers in Bungo Tebo Estate (total workers is 262). Status is Paid.</p> <p>Scheme Smallholder: Workers at smallholder’s blocks for harvesting and fertilizer application mostly handle by block owner itself. For pesticide/herbicide application conducted by permanent workers of the company. Medical and social</p>	<p>NC# 1679639-201809-N2 Closed on 24/10/2019 Comply</p>

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	insurance for spraying workers already registered by BPJS Kesehatan and BPJS Tenaga Kerja, managed by the company.	
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. - Minor compliance</p>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has demonstrated the record of OHS injuries by using the LTA metrics. The report of incidences in January to September 2019 there was 8 accidents recorded (category in low accidents with <2 lost mandays). Refreshment training related accident investigation procedure to all supervisor (assistant and fore man) has been carried out by company. Data verification during ASA4; - Based on document review related to Accidents Report year 2019, there were reported 8 accidents with category is low (medical aid) – no medium or major category reported. - The document of Accidents Investigation shown sufficient and there was conducted for all category of accidents, e.g: Report of Accident Investigation dated 14th August 2019 namely Mrs IAS (harvester), location of accidents in division IV block D08D. The corrective has followed up and implementation. The recommendation for corrective action is available. - Refreshment training related to investigation procedure was conducted on 13th August 2019 attended by 8 supervisor.</p> <p>Scheme Smallholder: Scheme smallholder management of PT. Rigunas Agri Utama recorded the lost time injury under record "Rekaman Kejadian Kecelakaan Kerja" period 2019. Record verified and sighted: 1. KOPERASI SAWIT KELUARGA SEJAHTERA. Recorded 1 minor incident on 4/04/2019. Activity: Harvesting. 2. KOPERASI SAWIT SUMAY MAKMUR. Recorded 1 minor incident on 10/04/2019. Activity: Harvesting.</p>	<p>NC # 1679639- 201809-N4 Closed on 24/10/2019 Comply</p>

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		3. KOPERASI SAWIT MAKMUR BERSAMA. Recorded 1 minor incident on 7/08/2019. Activity: Harvesting. 4. KOPERASI BAROKAH. Recorded 1 minor incident on 8/07/2019. Activity: Harvesting. 5. KOPERASI SAWIT TANDUK PERKASA. Recorded 1 minor incident on 5/05/2019. Activity: Harvesting. Farmer itself conducts smallholder’s activities, therefore an incident report not calculated using LTA metrics.	
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.			
4.8.1	Records of training program related to the aspects of RSPO Principles and Criteria shall be available. - Major compliance -	Bungo Tebo POM and Estate: PT Rigunas Agri Utama has demonstrated the records of training program related to PnC RSPO under “Program Pelatihan Environmental and Sustainability year 2019” prepared by Training Center Asian Agri, Pekanbaru – based on competence mapping. Training program, such as: <ul style="list-style-type: none"> – Sustainability Awareness (RSPO P&C, ISCC, ISPO); planned in November 2019 – Basic Fire training; planned March 2019 – First aider/“Pertolongan Pertama Gawat Darurat”; planned June 2019 – Handling hazardous waste; planned in April 2019 – Safety Use Herbicide and Chemical; planned in May 2019 – HCV training; planned August 2019 – Basic Safety training; planned June 2019 – Heavy machinery operator training; planned May 2019; – Traceability and Mass Balance; planned in May 201 – Refresh training for Boiler operators; planned for December 2019, – Training on handling of hazardous waste; planned for October 2019. 	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Sample record of the realization, such:</p> <ul style="list-style-type: none"> - Training on socialization of company’s policy dated 8th August 2019, was attended by 64 workers - Refresh training on traceable RSPO certification dated 25th March 2019, was attended by 9 workers. - List of attendance on training of pesticides handling dated 11th September 2019, was attended by 56 workers. Trainer: Mrs Mona Budhiana, SP (supplier – PT Syngenta). - Refresh training on first aid dated 26th September 2019, was attended by 25 workers. Training Dr Yudi Candra (company doctor). <p>Scheme Smallholder:</p> <p>KOPERASI SAWIT TANDUK PERKASA:</p> <ul style="list-style-type: none"> - Harvesting Training on 24 January 2019. Attended by 20 smallholders. - Training of Mechanism on Determining of Smallholders FFB Prices, dated 10 January 2019. Attended by 17 smallholders. - Training of OHS for Smallholders, dated 15 February 2019. Attended by 16 smallholders. - Training of Block Maintenance and Weeds Management, dated 24 May 2019. Attended by 18 smallholders. - Training on Management Area of HCV, dated 25 July 2019. Attended by 20 smallholders. - Training on First Aid and Emergency, dated 14 August 2019. Attended by 24 smallholders. - Training on Emergency Response and Basic Fire, dated 11 April 2019. Attended by 20 smallholders. - Training on Integrated Pest Management, dated 20 December 2018. Attended by 16 smallholders. - Training on Environmental Impact, dated 6 March 2019. Attended by 22 smallholders. <p>KOPERASI SAWIT KELUARGA SEJAHTERA:</p> <ul style="list-style-type: none"> - Harvesting Training on 23 January 2019. Attended by 11 smallholders. - Training of Mechanism on Determining of Smallholders FFB Prices, dated 9 January 2019. Attended by 11 smallholders. 	

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Training of OHS for Smallholders, dated 12 February 2019. Attended by 10 smallholders. - Training on Integrated Pest Management, dated 18 December 2018. Attended by 11 smallholders. - Training on First Aid and Emergency, dated 21 August 2018. Attended by 23 smallholders. - Training on Emergency Response and Basic Fire, dated 17 October 2019. Attended by 23 smallholders. - Training of Block Maintenance and Weeds Management, dated 22 May 2019. Attended by 12 smallholders. <p>KOPERASI SAWIT MAKMUR BERSAMA:</p> <ul style="list-style-type: none"> - Harvesting Training on 25 January 2019. Attended by 14 smallholders. - Training of Mechanism on Determining of Smallholders FFB Prices, dated 11 January 2019. Attended by 13 smallholders. - Training on Integrated Pest Management, dated 19 December 2018. Attended by 13 smallholders. - Training on First Aid and Emergency, dated 14 August 2019. Attended by 25 smallholders. - Training on Emergency Response and Basic Fire, dated 17 October 2019. Attended by 23 smallholders. - Training on Cooperative Policies, dated 8 March 2019. Attended by 13 smallholders. - Training of Block Maintenance and Weeds Management, dated 23 May 2019. Attended by 15 smallholders. <p>KOPERASI SAWIT SUMAY MAKMUR:</p> <ul style="list-style-type: none"> - Harvesting Training on 17 January 2019. Attended by 15 smallholders. - Training of Mechanism on Determining of Smallholders FFB Prices, dated 3 January 2019. Attended by 15 smallholders. - Training of OHS for Smallholders, dated 14 February 2019. Attended by 16 smallholders. - Training on Integrated Pest Management, dated 12 December 2018. Attended by 17 smallholders. - Training on First Aid and Emergency, dated 8 August 2019. Attended by 23 smallholders. 	

Criterion / Indicator		Assessment Findings	Compliance				
		<ul style="list-style-type: none"> - Training on Emergency Response and Basic Fire, dated 4 April 2019. Attended by 16 smallholders. - Training on Cooperative Policies, dated 1 March 2019. Attended by 17 smallholders. - Training of Environmental Impact, dated 12 March 2019. Attended by 15 smallholders. - Training of Block Maintenance and Weeds Management, dated 8 May 2019. Attended by 17 smallholders. <p>KOPERASI BAROKAH:</p> <ul style="list-style-type: none"> - Harvesting Training on 8 January 2019. Attended by 16 smallholders. - Training of Mechanism on Determining of Smallholders FFB Prices, dated 2 January 2019. Attended by 13 smallholders. - Training of OHS for Smallholders, dated 13 February 2019. Attended by 22 smallholders. - Training on Integrated Pest Management, dated 5 December 2018. Attended by 23 smallholders. - Training on First Aid and Emergency, dated 25 October 2018. Attended by 32 smallholders. - Training of Environmental Impact, dated 6 March 2019. Attended by 22 smallholders. - Training of Block Maintenance and Weeds Management, dated 7 May 2019. Attended by 15 smallholders. <p>Based on interview with sample of smallholders at KOPERASI Sawit Sumay Makmur (Hampan-05), KOPERASI Sawit Makmur Bersama (Hampan-77), KOPERASI Barokah (Hampan-17) and KOPERASI Sawit Tanduk Perkasa (Hampan-56), the smallholders explain that company always provide training or awareness at field basis.</p>					
4.8.2	Records of training for each employee shall be maintained. - Minor compliance –	<p>Records of training for each employee has demonstrated under "Personel Data Training". Evidences verification of training records, e.g:</p> <ul style="list-style-type: none"> - Namely Mr Hendri Putra (Helper in Chemical Store) <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Subject of training</th> <th style="width: 50%;">Date of training</th> </tr> </thead> <tbody> <tr> <td>First aider</td> <td>23rd August 2016</td> </tr> </tbody> </table>	Subject of training	Date of training	First aider	23 rd August 2016	Comply
Subject of training	Date of training						
First aider	23 rd August 2016						

Criterion / Indicator		Assessment Findings		Compliance
		Refresh training of company policy	8 th August 2019	
		Training of emergency response	26 th September 2019	
		– Namely Mr Dian Amrizal (Operator/Mechanic)		
		Subject of training	Date of training	
		Basic fire training	19 th June 2014	
		Tire maintenance training	28 th October 2014	
		First aider	23 rd August 2016	
		Refresh training of company policy	8 th August 2019	
		Training of emergency response	26 th September 2019	
		– Namely Mr Ependi (Supervisor for chemical applicator)		
		Subject of training	Date of training	
		Training on sustainability awareness	1 st October 2014	
		Training on handling of limited pesticides	27 th November 2014	
		Training for first aider	23 rd August 2016	
		Refresh training on sustainability awareness	24 th April 2016	
		Refresh training of company policy	8 th August 2019	

Criterion / Indicator		Assessment Findings	Compliance		
		<table border="1"> <tr> <td>Training of emergency response</td> <td>26th September 2019</td> </tr> </table> <p>Scheme Smallholder: Employees at smallholders is block owner itself. Records of training as mentioned in above indicators is assigned to Farmer Group Manager or “Ketua Kelompok Tani/Hamparan”, and then the Manager will transfer to individual smallholders/block owners.</p>	Training of emergency response	26 th September 2019	
Training of emergency response	26 th September 2019				
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity					
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.					
5.1.1	Environmental impact assessment document(s) shall be available. - Major compliance -	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has shown the document of Environmental Impact Assessment (EIA), i.e:</p> <ol style="list-style-type: none"> 1. The previous SEIA was “ANDAL (Analisa Dampak Lingkungan) & RKL-RPL (Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Perkebunan Kelapa Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama” datum 2003. The documents have been approved based on “Persetujuan Komisi AMDAL Propinsi Jambi No.273 Tahun 2003” dated 11th July 2003. 2. The latest SEIA was available in term of “Adendum ANDAL (Analisa Dampak Lingkungan) & Rencana Pengelolaan Lingkungan Hidup – Rencana Pemantauan Lingkungan Hidup (RKL– RPL)” regarding Development of Kernel Crushing Plant (KCP) with production capacity 200 ton/day, development of electricity power (PLTBG) that produced electricity 3 MW and replanting for 2,506 Ha. The documents have been approved based on Decree of Tebo Regent No.86 Year 2017” dated 2nd February 2017 regarding Environment Permit (Izin Lingkungan) and No.85 Year 2017 dated 2nd February 2017 regarding “Kelayakan Lingkungan”. <p>This documents covers the area of 8,676 Ha (2,551 Ha planted for nucleus estate and 6,116 Ha planted for scheme smallholders), with palm oil mill capacity 60 tons FFB/hour, KCP 200 ton/day, electricity power 3 MW and 2,506 replanting area in the nucleus estate. The area of study covers Tuo Sumai</p>	Comply		

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	<p>Village, Sungai Rambai Village, Pinang Belai Village (SP1), Sekuntum Jayo Village (SP2), Bukit Pemuatan Village (SP5) and Napal Putih Village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province, year of study 2016.</p> <p>All significant impacts have been identified i.e. reduction of soil and water quality, reduction of air quality, impact to socio-economic of local community, impact to occupational health and safety, work and road traffic accident, land fire, and disturbance of natural water balance. Plan to monitor and manage of each identified environment impact have been provided and documented.</p>	
<p>5.1.2</p>	<p>Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p> <p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has implemented environmental management system to manage impact from plantation and milling operations.</p> <p>The documents of "Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan" are available and in line with ANDAL document.</p> <p>In 2019, the environmental management plan (for significant impact) consisted of:</p> <ol style="list-style-type: none"> 1. Significant Impacts: Mobilization of heavy equipment and material during replanting; decrease of air quality; Program: air quality are maintained (parameter SO₂, CO, NO₂, O₃, HC, PM₁₀, PM_{2.5}) under standard based on PP No.41/1999 regarding Air Pollution Control. 2. Significant Impact: increase of noise level; Program: Decree of Minister of Environment No. KEP-48/MENLH/11/1996, regarding standard of noise level; 3. Significant Impact: decrease of community health; Program: increase community sanitary environment, clean and healthy attitude of community 4. Significant Impacts: Soil erosion due to replanting activity; Program: <ul style="list-style-type: none"> – Make terrace in areas with a slope > 12° – Planting legume cover crop – Make a trench subside in lowland areas – Make a stop in the area of the bunch teresan – Making the hoof to areas with a slope < 12° 	<p>Comply</p>

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	<p>PT Rigunas Agri Utama has assigned the Estate Manager and Mill Manger as PIC to control and ensure the document of EIA was implementation.</p>	
<p>5.1.3</p> <p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arise from the monitoring result) and its review available under Report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester). The latest report available for period January to June 2019, number of document 036/MI-PBT/Ext/08/2019, has submitted to Environmental Agency in Tebo Regency dated 9th August 2019.</p> <p>Sample of document verification (certificates) on monitoring of environmental impact period first semester I (January to June 2019), such as:</p> <ul style="list-style-type: none"> - Certificate of Report Analysis; type of sample is Air Emission; sample identification in Generator no 01 and 02 of Bungo Tebo Mill; conducted by Sucofindo (Accreditation Laboratory), dated of sampling 11th May 2019. The result of analysis was complied with KEP.07/MENLH/2007, Attachment I. - Report Analysis for Air Ambient and Noise (outdoor); location of sampling before Mill and after Mill. Certificate number 02444/CLAKAM, dated 4th June 2019, conducted by Sucofindo (Accreditation Laboratory). The result of analysis was complied with PP RI No. 41 year 1999 and KepMenLH No. 48/MENLH/11/1996 - Report Analysis for Air Ambient and Noise (indoor); Certificate number 02447/CLAKAM, dated 4th June 2019, conducted by Sucofindo (Accreditation Laboratory). The result of analysis was complied with Permenakertrans No.Per 05 Tahun 2008 - Surface Water quality monitoring conducted each semester by Sucofindo. Latest analysis conducted on 10th May 2019. Report of Analysis no 02441/CLAKAL, sample test location: upstream and downstream of Pemuatan river, Lalo river, Belangkai river. The result of analysis was complied with PP No. 82, 2001 (Class II). - Certificate on monitoring of wastes water conducted each month by "UPTD Laboratorium Lingkungan Daerah – Dinas Lingkungan Hidup Provinsi Jambi". The results analysis from January to September 2019 can be demonstrated (for example LHU No. 835/LHU/L2JBI/VII/18 July 2018) and are still below 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>the quality standard in accordance KepMenLH no 28-29 tahun 2003 Tentang Pedoman Syarat dan Tata Cara Perizinan Pemanfaatan Air Limbah Minyak Sawit di Perkebunan Kelapa Sawit.</p>	
<p>Criterion 5.2:</p>		
<p>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 and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p>	<p>Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available.</p> <p>- Major compliance -</p> <p>Bungo Tebo POM and Estate:</p> <p>Company including scheme smallholder has conducted HCV identification in coordination with Faculty of Forestry from IPB (Bogor Agricultural University). The identification result recorded and reported under "Laporan Akhir Identifikasi Keberadaan Nilai Konservasi Tinggi (NKT) di areal PT Rigunas Agri Utama, Kabupaten Tebo". The scope of study covers nucleus estate of PT Rigunas Agri Utama plantation (covers 2,551 Ha) and smallholder estate/plantation (covers 5,914 Ha), located in Sumay District, Rambai District and Serai Serumpun District. The HCV identification was using Guidance on Identification of HCV in Indonesia, published by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008.</p> <p>The assessor of HCV consist of:</p> <ul style="list-style-type: none"> - Dr. Ir. H. Nyoto Santoso, MS.: Team Leader, listed as RSPO HCV Assessor (listed as Provisionally Licensed Assessor, dated 23 April 2015); - Udi Kusdinar, S.Hut.: Social and Cultural aspects, listed as RSPO HCV Aassessor. - Sulfan Ardiansyah, S.Hut.: Flora Ecology and Environmental Services, listed as RSPO HCV Assessor. - M. Syayidina Ali, Amd.: GIS (listed as Provisionally Licensed Assessor, dated 23 April 2015). - Gilang Prastya Pambudi, S.Hut.: Social-cultural aspect, listed as RSPO HCV Assessor. <p>The HCV identification survey was carried out on 23 – 27 April 2013. The involvement of interested parties in form of interview, discussion and/or public consultation. For example: Discussion with authorities of Serai Serumpun district, interview with Pinang Belai Village, discussion with villagers of Sekutur Jaya Village, interview with committee of KUD Sumai Makmur, interview with Sumay District public servants, interview with villagers of Sungai Rambai Vilage, etc.</p>	<p>Comply</p>

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	<p>The public consultation was carried out on 26 April 2013, located in “Balai Kecamatan Serai Serumpun”, which attended by 28 participants, representing village authorities, villagers, elderly and community figures, district head and KUD Plasma.</p> <p>Company has in cooperation with community for the management of HCV, as written in Statement “Pernyataan Bersama” signed by PT Rigunas Agri Utama’s management, six (6) village heads and 9 leaders of KUD. The statement was stating commitment towards: to protect wildlife inside the scheme smallholder plantation SP1 – SP7, and agreed to no–hunting policy; Community agreed to stop the use of poison and electricity to catch fish; To protect river buffer zone through: no chemical fertilizer application, using organic fertilizer, to plant river buffer zone with local species tree – and to nurture/maintain the tree; no use of open-fire in scheme smallholder plantation; to actively participate in electric fence program to drive away elephant; to communicates the policy to communities. The statement was signed on 26 April 2013 by all representatives.</p>	
<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>HCV identified in Bungo Tebo Estate consist of:</p> <p>HCV 1.2, HCV 4.1 in Riparian area Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai Bul river with area 17.54 Ha.</p> <ul style="list-style-type: none"> - HCV 6, graveyard in Division III area, 0.05 Ha. - HCV identified in Bungo Tebo Plasma consist of: - HCV 1.2 and 4.1 in Riparian area of river Kebung, Lawai, Sukorejo, Sekutur, Lalo, Benanai, Benanai Bul, Belangkai, Cenio, Anak Batang Sumay with area 52.04 ha. <p>RTE species identified in area Bungo Tebo Estate and Plasma are as follows:</p> <ul style="list-style-type: none"> - Kucing kuwuk (Prionailurus bengalensis) - Lutung (Presbytis melalophos) - Lutung abu – abu (Trachypithecus cristatus) - Berang-berang (Prionodon linsang) - Gajah (Elephas maximus) 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Pijantung kecil (<i>Arachnotera longirostra</i>) - Raja udang meninting (<i>Alcedo meninting</i>) - Elang hitam (<i>Ictinaetus malayensis</i>) - Burung madu kelapa (<i>Anthreptes malaccensis</i>) - Elang ular bido (<i>Spilornis cheela</i>) - Kipasan belang (<i>Rhipidura javanica</i>) - Cekakak belukar (<i>Halcyon smirnsensis</i>) - Cekakak sungai (<i>Halcyon chloris</i>) - Burung madu sepah raja (<i>Aethopyga siparaja</i>) <p>Company and cooperative were working together to monitor elephant movement and drive away elephant (if comes to plantation). Record seen: "Pemantauan Serangan Gajah Afdeling IV KBT Tahun 2019", was based on daily patrol. Based on report dated ytd September 2019, there was no elephant attack in Division IV. The record was in line with statement from farmers, village authorities and local communities. Based on the interview, community was stating that since early 2014, there was no more elephant attack.</p> <p>Based on document verification upon "Laporan hasil monitoring Pengelolaan Tumbuhan dan Satwa" period Semester I 2019 shows in the area of Bungo Tebo Estate identified 4 types of protected under IUCN and CITES. Report of HCV semester I 2019 has been submitted to BKSDA Provinsi Sumatera Utara.</p> <p>Bungo Tebo Estate also has monitoring the RTE species each month as present in "Daftar Temuan Satwa Liar di Areal Kebun PT Rigunas Agri Utama". Based on monitoring result since January – September 2019, there were still found the RTE species consist of: Elang ular bido (<i>Spilornis cheela</i>), Ayam hutan (<i>Gallus gallus</i>), Burung raja udang (<i>Pelargopsis capensis</i>), Kucing hutan (<i>Felis bengalensis</i>), Ular tikus (<i>Ictinaetus malayensis</i>), Monyet Ekor panjang (<i>Macaca fascicularis</i>).</p> <p>Based on field verification, company has demonstrated effort for management and monitoring of HCV area. Company also installed identity signboard and warning signboard on the field</p>	
<p>5.2.3</p>	<p>Program(s) to socialize the status of protected, rare,</p> <p>Bungo Tebo POM and Estate:</p>	<p>Comply</p>

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<p>threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p>	<p>Company has demonstrate consistency in providing training, communication and socialization of HCV. Bungo Tebo Estate has been performed the socialization to the workers and surrounding community as explain in minutes of socialization dated 12 July 2019 attend by 15 participants from Pinang Belai Village, dated 26 July 2019 attend by 19 participants from Sako Makmur Village. Socialization workers on 7 August 2019 attend by 25 participants and dated 14 May 2019 attend by 28 participants.</p> <p>Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>Refreshment and awareness regarding HCV and wildlife protection performed by company through master morning in each division/afdeling Bungo Tebo Estate.</p> <p>Field visit verification:</p> <p>KUD Sawit Makmur Bersama</p> <p>Hamparan 56, block No.1529 and 1530, understood and implement the policy of no-hunting, no poisoning fish in river. The smallholder understand species of wildlife in their plantation: Cobra (Naja sumatrana), Long-tailed Macaque (Macacca vasicularis), (Felis bengalensis)</p> <p>KUD Barokah</p> <p>Hamparan 22, block No.434, understood and implement the policy of no-hunting, no cutting timber, no poisoning fish in river, respect sacred sites. Adjacent to the block is area with steep slope and not opened – as habitat for birds.</p> <p>KUD Sawit Tanduk Perkasa</p> <p>Hamparan 69, block No.1275 and 1276, understood and implement the policy of no-hunting, no cutting timber, no poisoning fish in river, respect sacred sites. The smallholder understand species of wildlife in their plantation: Cobra (Naja sumatrana), Long-tailed Macaque (Macacca vasicularis), Monitor lizard (Varanus salvator), King fisher bird (Alcedo meninting)</p>	
<p>5.2.4 Once the management plan is prepared, continuous monitoring documentation and</p>	<p>Bungo Tebo POM and Estate:</p>	<p>Comply</p>

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<p>report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.</p> <p>- Minor compliance –</p>	<p>Company has prepared Conservation Management Plan 2019, detailing location of HCV area, hectare of HCV area, management objective, management program, method, person in charge, target of implementation and monthly status.</p> <p>Company has consistently monitors the status of HCV area, as well as protected flora and fauna species. This is recorded in "Laporan Monitoring Tumbuhan dan Satwa Liar PT Rigunas Agri Utama periode Semester I 2019" – monitoring period January – June 2019. The report explains the monitoring on status of pland and wildlife, disturbance and damage to the protected area.</p> <p>Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Observation result since January to September 2019 documented in the "Daftar Temuan satwa liar di areal kebun PT Rigunas Agri Utama". Based on monitoring result since January – September 2019, there were still found the RTE species consist of: Elang ular bido (<i>Spilornis cheela</i>), Ayam hutan (<i>Gallus gallus</i>), Burung raja udang (<i>Pelargopsis capensis</i>), Kucing hutan (<i>Felis bengalensis</i>), Ular tikus (<i>Ictinaetus malayensis</i>), Monyet Ekor panjang (<i>Macaca fascicularis</i>).</p> <p>Specific monitoring for elephant was done through patrol on areas where indicated as elephant range/path. The patrol carried out on daily basis and reported under "Laporan Monitoring Serangan Gajah". Based on report review, in 2019, there was no elephant attack.</p>	
<p>5.2.5 Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>All HCV area has been identified was located within company and/or scheme smallholder control and monitoring. There was no HCV areas identified located under local coomunity right.</p>	<p>Not Applicable N/A</p>
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.1</p> <p>A documented identified source of all waste and pollution, shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Identification of source of waste and pollution has shown including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>Record of identification has presented in "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT, last review on 11th February 2019 both for Bungo Tebo Mill and Bungo Tebo Estate.</p> <p>All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste water, particulate from boiler stack, noise, used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>PT Rigunas Agri Utama has also established the procedure to manage the waste generated from all activity, such as:</p> <ol style="list-style-type: none"> 1. Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill waste (used rail, used part, ex-chemical non-hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, scraped/used parts, used tire), Power generator waste (used hose, used parts, scarped), logistic waste (ex-fertilizer sack, used drum) 2. Procedure AA-KL-11-EFP, procedure of laboratory waste handling. 3. Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPMOP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar". 4. EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1. <p>SOP AA-PL-04-EFP Rev. 2 dated 15 Jan 2010, procedure for utilize the waste water from waste water installation in to the plantation as land application and accordingly "Keputusan Bupati tebo Nomor 354 Tahun 2015 tentang izin Pemanfaatan Air Limbah pabrik Kelapa Sawit Pada Tanah di Perkebunan Kelapa Sawit PT Rigunas Agri Utama" dated 23 June 2015 valid until 5 years.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has established the procedure of hazardous waste handling "SOP Penanganan Bahan Berbahaya dan Beracun" AA-KL-03-EFP Rev. 4 dated 15 November 2011. The procedure explains the guidance to identify hazardous waste, collect hazardous waste, recording hazardous waste, safe handling of hazardous waste and disposal of through licensed contractors. The hazardous waste in storage has recorded and balancing stock maintained.</p> <p>All empty agrochemical containers were triple rinsed, the jerry can were reused for spraying activities while bottles containers were stored in the designated area and categorized as hazardous waste (B3)</p> <p>Records of chemical containers quantity disposed were evident. Liquid waste from agrochemical was re-used for the next spraying application. Several ex-chemicals materials containers that use at mills operations such as laboratory chemicals ex-containers and the others, such as boiler additive liquids, lubricants, workshop materials, used battery, etc. were categorized as hazardous wastes that stored at temporary hazardous waste storage (TPS B3) that will be managed by licensed vendor (third party)</p>	<p>Comply</p>
<p>5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has shown the document of waste management plan under "Evaluasi Aspek Dampak Lingkungan" nomor: EMS-431-003-LT last review on February 2019. The identification of waste and pollution sources including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>Hazardous and medical waste is disposed to the register collectors while domestic waste disposed to the landfill, organic and an organic waste is separate in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle.</p> <p>PT Rigunas Agri Utama has also established the procedure to manage the waste generated from all activity, such as:</p> <ul style="list-style-type: none"> - Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill water (used rail, used part, ex chemical non-hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, 	<p>Comply</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>scraped/used parts, used tire), power generator waste (used hose, used parts, scarped), Logistic waste (ex-fertilizer sack, used drum).</p> <ul style="list-style-type: none"> - Procedure AA-KL-11-EFP, procedure of laboratory waste handling. - Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPM-OP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar". - EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1. <p>Procedure on utilize the waste water from waste water installation in to the plantation as land application according to SOP AA-PL-04-EFP Rev. 2 dated 15 Jan 2010 and "Keputusan Bupati Tebo Nomor 354 Tahun 2015 tentang izin Pemanfaatan Air Limbah pabrik Kelapa Sawit Pada Tanah di Perkebunan Kelapa Sawit PT Rigunas Agri Utama"da ted 23 June 2015 valid until 5 years</p>	
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has shown the document a plan for improving efficiency of the use of fossil fuels and to optimizer renewable energy under document of "Pemakaian Energi 2019".</p> <p>Energy use records include accurate measurements of renewable energy use per tonnage of FFB processed. Fossil fuel usage recorded for operational purpose, including the efficiency analysis.</p> <p>PT Rigunas Agri Utama already maximize the renewable energy use. All oil palm shell and fibred consumed internally as boiler fuel.</p> <p>In 2019, the program to minimize the fossil fuel usage, such as:</p> <ol style="list-style-type: none"> 1. Shutting down the generator set on holiday at 12.00 – 13.00 2. Reduce the generator set usage during turbine operation 3. Reduce the electricity usage by: <ul style="list-style-type: none"> • Change the electricity source from generator set to be PLN electricity. 	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Determined and install the MCB with only 2 ampere in each house. • Change the lamp 250 W as much as 6 pcs in thresher station with lamp XL 65 watt as much as 12 pcs with operating time 14 hour/day • Change the lamp 500 W as much as 2 pcs in press station with lamp XL 65 watt as much as 8 pcs with operating time 14 hour/day • Change the lamp 1000 W as much as 2 pcs in kernel station with lamp XL 65 watt as much as 8 pcs with operating time 14 hour/day • Modify bunch crusher machine from 2 electromotor 15 KW usage to become 1 electromotor 15 KW Inactivate 2 units pump recovery 15 KW which use for deliver the waste water from recovery to IPAL.	
<p>Criterion 5.5: 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.</p>		
<p>5.5.1</p>	<p>Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations.</p> <p>- Major compliance -</p> <p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama as subsidiary of PT Inti Indosawit Subur has policy of zero burning dated 1 December 2014 which stated "<i>Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap</i>" that is performing zero burning practices in developing plantation and activities support initiative to prevent forest fire and haze</p> <p>There is an SOP for land preparation and replanting AA-APM-OP-1100.20.R6, which mentioned strictly on zero burning policy.</p> <p>During ASA 4, based on filed visit there were no burning on replanting activities. Replanting performed by contractor based on Agreement letter and SPK. The agreement letter and SPK also mentioned that zero burning in replanting activity. Replanting activity performed mechanically by heavy equipment, consist of:</p> <ul style="list-style-type: none"> - Felling and chipping by excavator - Terracing by excavator - Making planting hole - Road creating by bulldozer 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Ditch and drainage system by excavator - Plow and harrowing by tractor - Fertilizing - Planting cover crop - Planting palm trees. <p>PT Rigunas Agri Utama has also conducted the daily fire patrol to prevent the fire and ensure the zero burning, recorded in "Laporan Pemantauan Kebakaran Lahan dan Pabrik". Monthly monitoring for period 1st Semester 2019 be demonstrated.</p> <p>Scheme Smallholder:</p> <p>PT. Rigunas Agri Utama as subsidiary of PT Inti Indosawit Subur has policy of zero burning dated 1 December 2014 which stated "<i>Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap</i>" that is Performing zero burning practices in developing plantation and actively support initiative to prevent forest fire and haze. There is an SOP for land preparation and replanting AA-APM-OP-1100.20.R6, which mentioned strictly on zero burning policy.</p> <p>No land clearing and no burning found at smallholders blocks.</p>	
<p>5.5.2</p>	<p>Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available.</p> <p>- Minor compliance -</p> <p>Bungo Tebo Estate and Scheme Smallholder:</p> <p>No open burning has noted for land preparation nor for eradication of pest during replanting.</p> <p>The area of KOPERASI Sawit Sumay Makmur (SP-1), KOPERASI Sawit Makmur Bersama (SP-5), KOPERASI Barokah and KOPERASI Sawit Tanduk Perkasa (SP-7) were planted between years 1994 – 1996. Up to this audit of 4th annual surveillance assessment (ASA4), no land clearing for replanting performed since first planting, no burning for eradication of pest was found.</p> <p>Field visit verification:</p> <p>KUD Sawit Makmur Bersama</p> <p>Hamparan 56, block No.1529 and 1530, planting year in 1995 – no burning.</p>	<p>Comply</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>KUD Barokah Hampan 22, block No.434, planting year in 1996 – no burning.</p> <p>KUD Sawit Tanduk Perkasa Hampan 69, block No.1275 and 1276, planting year in 1995 – no burning.</p> <p>KUD Sawit Sumay Makmur Hampan 03, block No.278, 279 and 280, planting year in 1995 – no burning.</p>	
Criterion 5.6:			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	<p>Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4)</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>There are no any significant changes related to document on assessing pollution and emission sources from last assessment.</p> <p>The documents of identification and assessing the pollution and emission sources has covered on document of "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT, last review on February 2019, was covering: input, environmental aspect, caused, environmental impact potential, and control. All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste water, particulate from boiler stack and noises.</p> <p>The significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides. Graph of emission and pollutant has provided to monitor trend of them in monthly basis.</p> <ul style="list-style-type: none"> - Using EFB as organic fertilizer. - Planting beneficial plant - Efficiency of fossil fuel. - Using fibre and shell for boiler <p>Increasing renewable energy usage as electricity from methane capture facility.</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Scheme Smallholder: impact, evaluation criteria, significance, and operational control. The document covers all activities in plantation and pollution potency, e.g.: fertilizer leaching, fertilizer waste, pesticide and containers, emission form transportation, waste lubricant from transportation, etc. Smallholders has update the identification of pollutant and recorded in "Identifikasi Sumber Polusi di Perkebunan Petani dan Rencana Pengurangan Polusi" dated February 2019. Smallholders has identify source of pollution is origin from core activities, such as FFB transportation, Applying Fertilizer and Maintenance (manual with slashing machine and herbicide application). Emission from its activities are sample seen: "Evaluasi Aspek Dampak Lingkungan KOPERASI Sawit Sumay Makmur (SP-1), KOPERASI Sawit Makmur Bersama (SP-5), KOPERASI Barokah and KOPERASI Sawit Tanduk Perkasa (SP-7).</p>	
<p>5.6.2</p> <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented. - Major compliance -</p>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama – Bungo Tebo POM has a Standard Operating Procedure "Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG) AA-MPM-OP- 1400.19.R1", dated 3 January 2014. The procedure explains the management and method to calculate greenhouse gas emission. The management plan through avoiding planting on high carbon stock area, increase the carbon sequestration, reducing use of fossil fuel, implementing zero-burning policy in all company operation, using technology to minimize GHG emission (e.g. methane capture). Currently company has implemented:</p> <ul style="list-style-type: none"> - Avoidance planting on high carbon stock area: planting oil palm on mineral soil (land suitability report); Bungo Tebo Estate conserve all riparian area at Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai Pul river. - Increase the carbon sequestration: based on PalmGHG monitoring 2018, the own crop sequestration indicating 0.62 tCO₂e/ton FFB; - Reducing use of fossil fuel; Bungo Tebo POM has use 100% fibre and most of shell as a boiler fuel; Replace the generator set usage for electricity by PLN to reduce the diesel fuel, currently company has 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>proposed to PLN and has follow up by PLN and planed in the end of the year the electricity will installed to the Sei Lalo & Pulai housing (192 house)</p> <ul style="list-style-type: none"> - Implementing zero burning policy: replanting with mechanical method, no burning evident during field visit; - Introduce technology to minimize GHG emission: plan to install methane capture/biogas plant. - Monitoring of GHG emission planned for annual basis, which will act as basis for decision- making. <p>Bungo Tebo POM wastewater has processed through a series of wastewater treatment ponds: one cooling pond, one acid pond, two anaerobic ponds, one aeration pond, one sediment pond, and three buffer ponds. Process parameter monitoring and maintenance of the ponds has sighted. Quality of wastewater effluent has monitored quarterly in line with the requirements.</p> <p>The results of wastewater effluent monitoring has reviewed including measurement of BOD; the result of discharge effluent conforms to the limits for parameters.</p> <p>Scheme Smallholder:</p> <p>Significant pollutant and GHG emission from Smallholders block management is pollution from FFB transport (truck), Fertilizer and Herbicides application.</p> <ul style="list-style-type: none"> - FFB transport (truck) produce gas emission from fuel combustion. - Fertilizer will supply significant GHG emission, such as NOx, CO, etc. - Herbicides application will affect or threat watercourses. <p>Plan to reduce its pollution and emission through:</p> <ul style="list-style-type: none"> - Optimization on FFB transportation during harvesting cycle at smallholders block. - Applying fertilizer appropriately following the company recommendation on dosage per palm. - Reusing fertilizer bag for loose fruit during harvesting. - Supervising during herbicide application where applied close to watercourses. 	
<p>5.6.3</p>	<p>A monitoring plan and results of regular reporting on emission</p> <p>Bungo Tebo POM and Estate:</p>	<p>Comply</p>

Criterion / Indicator		Assessment Findings	Compliance
	<p>and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <p>- Minor compliance –</p>	<p>PT Rigunas Agri Utama has conducted monitoring of emission, and then calculate it using RSPO PalmGHG Calculator Version 3.0.1. The monitoring and calculation covers estate, smallholder and mill operation. Emission reduction has achieved.</p> <p>PT Rigunas Agri Utama has also prepared a strategy to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has planned and implemented, e.g. air quality ambient for boiler and generator, water quality test for river (upstream and downstream), effluent water quality, noise, etc. Monitoring of any pollutant has done in daily, weekly and monthly basis, report of monitoring recorded in the RKL/RPL” report, and this report submitted to the related institution every 6 month.</p> <p>There was available result of monitoring and calculation of pollutant and emission using Palm GHG Calculator Version 3.0.1. Emissions per product from estate and mill activities for year 2018 are 0.62 tCO2e/ton CPO and 0.62 tCO2e/ton PKO. The summary of the Nett GHG emitted in 2018 for PT Rigunas Agri Utama – Bungo Tebo POM and supply base are available in Appendix C of this report.</p> <p>Scheme Smallholder: Result and report on GHG emission for smallholders area already included within Palm GHG calculation by the company, because smallholders is supply bases of Bungo Tebo POM.</p>	
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers</p>			
<p>Criterion 6.1: 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.</p>			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme smallholder: PT Rigunas Agri Utama has had the document of Social Impact Assessment as in place in form of “ANDAL (Analisa Dampalk Lingkungan) & RKL-RPL (Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Perkebunan Kelapa Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama” year 2003. The documents have been approved based on “Persetujuan Komisi AMDAL Propinsi Jambi</p>	Comply

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	<p>No.273 Tahun 2003” dated 11th July 2003. This documents covers the plantation area of 10,367.55 Ha (2,193.85 planted for nucleus estate and 8,173.70 Ha planted for scheme smallholders), with palm oil mill capacity 60 tons FFB/hour, the area of study covers Tuo Sumai village, Sungai Rambai village, Pinang Belai village (SP1), Sekuntum Jayo village (SP2), Bukit Pemuatan village (SP5) and Napal Putih village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province, dated back 2003. Records of consultation incorporated in the document.</p> <p>The company also has had revising EIA document “Adendum ANDAL and RKL-RPL year 2017. The additional scope of Developmet including developmet activities of Kernel Chrusing Plant (KCP) capacity 200 ton/day, development of Biogas Power Plant (Pembangkit Listrik Tenaga Biogas – PLTBG) generating 3MW and Replanting Program 2,506 Ha location in Sumay District and Serai Serumpun District, Tebo Regency, Jambi Province. The permit of KCP has been approved.</p> <p>Company was in cooperation with researcher team, “Tim Peneliti Fakultas Pertanian Universitas Jambi” in 2011 to conduct social impact assessment. The result of assessment was reported under “Laporan Hasil Penelitian Identifikasi dan Evaluasi Aspek Sosial dan Ekonomi Masyarakat sekitar Perkebunan PT RAU, Kabupaten Tebo”. The researcher consist of: Prof. Dr. Ir. Zulkifli Alamsyah, MSc; Ir. Gindo Tampubolon, MS; Zakky Fathoni, S.P MSC; Fuad Muchlis, SP.M.Si; Idris Sardi, SP.M.Si.</p> <p>The research object covers company’s employee and surrounding village community, whose affected by social impact – from company operation activity. Identification criterion: social structure, provision of social facility, local community empowerment, organization reinforcement, environment management system, health and safety management system, health status, welfare status – of community. Variable being used: community characteristic, community and organization structure, social resources, individual and family changes, welfare indicator, economic facility, and community participation.</p> <p>PT Rigunas Agri Utama able to demonstrate a series of meeting with stakeholders. Community involvement during the assessment, in form of observation, interview and focus group discussion. Sample being used 471 households out of 7,815 households in three districts: Serai Serumpun, Sumay and Tebo Tengah district and thirteen (13) villages surrounding PT. Rigunas Agri Utama. Data analysis was using H-Assessment Diagram.</p>	
<p>6.1.2</p>	<p>There shall be evidence that the assessment has been conducted</p> <p>Bungo Tebo POM, Estate and Scheme smallholder:</p>	<p>Comply</p>

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<p>with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>PT Rigunas Agri Utama able to demonstrate a series of meeting with stakeholders. Community involvement during the assessment, in form of observatoin, interview and fcus group discussion. Sample being used 471 households out of 7,815 households in three districts: Serai Serumpun, Sumay and Tebo Tengah district and thirteen (13) villages surrounding PT. Rigunas Agri Utama. Data analysis was using H-Assessment Diagram. Result of assessment:</p> <p>Based on document verification and interview result with surrouding community, it was known that social impact identiication conducted by PT. Rigunas Agri Utama has taking into participation all interested parties, including local communities. In preparation of "Identifikasi dan Evaluasi Aspek Sosial dan Ekonomi Masyarakat 2011" community was involved during observation, interview and focus group discussion. Sample being used 471 households out of 7,815 households in three districts: Serai Serumpun, Sumay and Tebo Tengah district and thirteen (13) villages surrounding PT. Rigunas Agri Utama.</p> <p>During the preparation of AMDAL (2001) and Adendum ANDAL (2017), company has all interested parties to be involve, through filling in questionnaire, focus group discussion and interview. All interested parties, village authorities, district authorities, local communities, etc. was attended presentation of AMDAL draft. The result of AMDAL draft presentation was inorporated as input for revision.</p>	
<p>6.1.3</p> <p>Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme smallholder:</p> <p>PT Rigunas Agri Utama has shown the document of plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties under "Rencana Kelola Sosial year 2019".</p> <p>Based on document interview with stakeholders during surveillance visit e.g. BPD Kandang Village adn Head of Punti Kalo Village have noted shows social management of PT. Rigunas has involving surrounding communities.</p> <p>PT Rigunas Agri Utama has been communicating with surrounding villages before starting Corporate Social Responsibility activity.</p>	<p>Comply</p>

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Criterion / Indicator		Assessment Findings	Compliance
6.1.4	The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties. - Minor compliance –	Bungo Tebo POM, Estate and Scheme smallholder: PT Rigunas Agri Utama has documented and reviewed the plan for management and monitoring of social impacts under “Evaluasi Rencana Kelola Sosial Tahun 2018”. The document plan for management and monitoring of social impact has been reviewed minimum 2 yearly and continuously update when necessary, and the last review has conducted on 29 th August 2018. Based on document verification upon “Laporan Pelaksanaan Izin Lingkungan Semester II Tahun 2017 dan Semester I tahun 2018” company has presents a discussion on social impact management.	Comply
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance –	Bungo Tebo POM, Estate and Scheme smallholder: As explained in indicator 6.1.1, the scope social impact assessment covers the impact of scheme smallholder development – as an integral part of PT. Rigunas Agri Utama.	Not applicable N/A
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Communication and consultation procedures shall be documented. - Major compliance -	Bungo Tebo POM and Estate: Company has developed a communication procedure Under Mekanisme Penanganan Permintaan Informasi Stakeholder “(No. SOP; AA-GL-5008.1-R1) dated 22 nd August 2011, which explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. Mekanisme komunikasi, konsultasi masyarakat lokal (SOP No. AA-GL-5009.1.RO). Mekanisme Konflik lahan (SOP AA-GL- 5003.R.2). SOP related to communication and consultation is described in the SOP AA-GL-5009.1-R0 - Mechanism local communication/public consultation for interested parties.	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Scheme smallholders:</p> <p>Communication mechanism has been established and documented inside “Mekanisme Komunikasi, Konsultasi dan Keluhan”. Stakeholder and/or smallholder farmer can write down in guest list and recorded in record book. Answer can be given by cooperative chairman or upon discussion for concensus. The decision was informed both verbal and in written to stakeholder and/or smallholder farmer. Administration officer from cooperative records down any decision being informed to stakeholder and/or smallholder member.</p> <p>Koperasi Barokah have “Kebijakan Koperasi Barokah” signed on 7 January 2018; the policy stipulates on point 14 “Menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja” – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p> <p>KUD Sawit Makmur Bersama have “KUD Sawit Makmur Bersama” signed on 8 January 2018; the policy stipulates “Menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja” – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p> <p>Communication mechanism has been established and documented inside “Mekanisme Komunikasi, Konsultasi dan Keluhan”. Stakeholder and/or smallholder farmer can write down in guest list and recorded in record book. Answer can be given by cooperative chairman or upon discussion for concensus. The decision was informed both verbal and in written to stakeholder and/or smallholder farmer. Administration officer from cooperative records down any decision being informed to stakeholder and/or smallholder member.</p>	
<p>6.2.2</p> <p>The company shall have official(s) who is responsible for consultation and communications with parties.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>The company has appointed officers responsible to carried out communication and consultation with local communities is Public Relations/Humas Department (Bpk. Ahmad Bastari) as regulated in Pgae 3 in Standar Operasional Procedure No AA-GL-5009.1-R0 on - Mechanism local communication/public consultation for interested parties.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Scheme Smallholder:</p> <p>The cooperative has appointed officer with responsibility for consultation and communication with outside parties. The appointment based on decree signed by chairman. Decree sighted:</p> <ul style="list-style-type: none"> - "Surat Keputusan Pengurus KUD Sawit Keluarga Sejahtera No.03/KUD-SKS/I/2019" signed on January 2019. KUD Sawit Keluarga Sejahtera appointed Mr. Robby as Hubungan Masyarakat (Humas) officer to communicates and consult with stakeholders. - "Surat Keputusan Pengurus KUD Sawit Sumay Makmur No.08/KUD-SSM/II/2019" signed on February 2019. KUD Sawit Sumay Makmur appointed Mr. Solihin as Hubungan Masyarakat (Humas) officer to communicates and consult with stakeholders. - "Surat Keputusan Pengurus KUD Sawit Tanduk Perkasa No.32/KUD-STP/I/2018" signed on 1 December 2018. KUD Sawit Tanduk Perkasa appointed Mr. Tugiran as Hubungan Masyarakat (Humas) officer to communicates and consult with stakeholders. - "Surat Keputusan Pengurus KUD Sawit Makmur Bersama No.07/KUD-SMB/I/2019" signed on January 2019. KUD Sawit Makmur Bersama appointed Mr. Supardi as Hubungan Masyarakat (Humas) officer to communicates and consult with stakeholders. - "Surat Keputusan Pengurus KUD Barokah No.03/KUD-BRK/II/2019" signed on February 2019. KUD barokah appointed Mr. Rayan as Hubungan Masyarakat (Humas) officer to communicates and consult with stakeholders. 	
<p>6.2.3</p>	<p>The company shall have a list of stakeholders, records of communications, 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.</p> <p>- Minor compliance -</p> <p>BungoTebo POM and Estate:</p> <p>List of Stakeholders, updated in January 2019, e.g:</p> <ul style="list-style-type: none"> - Government: Bupati Tebo; DPRD Tebo; Dinas Perkebunan, Peternakan dan Perikanan; Dinas Koperasi, Perdagangan, Perindustrian dan Tenaga Kerja, Dinas Lingkungan Hidup, BPJS Kesehatan Cabang Tebo, BPJS Ketenagakerjaan, Badan Pertanahan Nasional Tebo - Masyarakat: Camat Serai Serumpun, Camat Sumay, Kapolsek Serai Serumpun, Kapolsek Sumay, Danramil Tebo Tengah, Danramil Tebo Ulu, Babinsa Desa tuo Sumay, Puskesmas Sumay, Puskesmas seari Serumpun, Lembaga Adat Tuo Sumay, Kades SP1-SP7, Kades Dusun tuo, Kades Teriti, Kades Kandang, SPSI PT RAU 	<p>Comply</p>

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	<ul style="list-style-type: none"> - KOPERASIs: KOPERASI Sawit Sumay Makmur, KOPERASI Sawit Makmur, KOPERASI Sawit Makmur Bersama, etc (there are 19 KOPERASIs) - NGO: Sawit Watch, Serikat Petani Kelapa Sawit, WWF for Nature, World Agroforestry Centre (ICRAF), Environmental Services Program <p>PT Rigunas Agri Utama has prepared a register of information request and responses to those information request under record called "Logbook Permintaan Informasi dan Respon Terhadap Permintaan Informasi PT. Rigunas Agri Utama Tahun 2019".</p> <p>Up to September 2019, the register was recorded 34 informations required and its response (todate September 2019), such as:</p> <ul style="list-style-type: none"> - Application for data information from Kabupaten Tebo Environmental office related to the LB3 Management report, PT RUA has responded and submitted the report LB3 on 14 October 2019. - Request information data from "Tebo District government related reports RKL-RPL semester I period in January-June 2019". PT RAU has responded by reporting the related documents on 12 August 2019. - Request for information from Tebo District agriculture office related to "Plantation Development progress Report" for semester I year 2019. PT RAU has responded through the Group Manager on 15 June 2019 and the submission of the report on 10 October 2019. - Request for information from BRIMOB Unit on 4 September 2019 based on letter No. SPRIN/211/IX/2019/SATBM about the application of labor assistance, was responded on 20 September 2019 by sending 4 people security - Request for information from BPJS Kesehatan on 8 October 2019 based on letter No. 1642/II-07/1019 on the call of compliance inquiry, was responded to on 9 October 2019. <p>Results of interviews with the Department of Manpower and Transmigration and Department of Agriculture and Department of Environment Tebo Regency is known that the company Rigunas Agri Utama is obedient and adhered to regulations that apply, especially Mandatory reports that must be submitted on a regular basis.</p>	

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	<p>Scheme smallholders</p> <p>Cooperative have listed all stakeholders:</p> <p>KUD Sawit Sumay Makmur – 2019, consist of Education: SD Negeri 217, SD Negeri Tanjung Dani, SMP Negeri SP 2 Sekutur Jaya;</p> <p>Villages and District: 17 Village heads, 2 District heads, 18 other Cooperatives;</p> <p>Government: Bupati Tebo, DPRD Tebo, Dinas Perkebunan, Dinas Tenaga Kerja, Dinas Lingkungan Hidup, Dinas Tata Kota;</p> <p>Security: Kapolsek Serai Serumpun, Kapolsek Sumay, Kapolsek Tebo Ulu, Komandan Daerah Militer Tebo Ulu, Badan Pembinaan Desa Sumay;</p> <p>NGO & press: Tuo Sumay cultural leader, LSM Merah Putih, Jambi Express;</p> <p>Worker union: Konfederasi Serikat Pekerja Seluruh Indonesia (SPSI);</p> <p>Paramedic: Puskesmas Serai Serumpun, Puskesmas Sumay;</p> <p>KUD Barokah – 2019, consist of Education: SD Negeri 217, SD Negeri Tanjung Dani, SMP Negeri SP 2 Sekutur Jaya;</p> <p>Villages and District: 17 Village heads, 2 District heads, 18 other Cooperatives;</p> <p>Government: Bupati Tebo, DPRD Tebo, Dinas Perkebunan, Dinas Tenaga Kerja, Dinas Lingkungan Hidup, Dinas Tata Kota;</p> <p>Security: Kapolsek Serai Serumpun, Kapolsek Sumay, Kapolsek Tebo Ulu, Komandan Daerah Militer Tebo Ulu, Badan Pembinaan Desa Sumay;</p> <p>NGO & press: Tuo Sumay cultural leader, LSM Merah Putih, Jambi Express;</p> <p>Worker union: Konfederasi Serikat Pekerja Seluruh Indonesia (SPSI);</p> <p>Paramedic: Puskesmas Serai Serumpun, Puskesmas Sumay</p> <p>KUD Sawit Keluarga Sejahtera – 2019, consist of Education: SD Negeri 217, SD Negeri Tanjung Dani, SMP Negeri SP 2 Sekutur Jaya;</p> <p>Villages and District: 17 Village heads, 2 District heads, 18 other Cooperatives;</p> <p>Government: Bupati Tebo, DPRD Tebo, Dinas Perkebunan, Dinas Tenaga Kerja, Dinas Lingkungan Hidup,</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Dinas Tata Kota, Kejaksaan Negeri; Security: Kapolsek Serai Serumpun, Kapolsek Sumay, Kapolsek Tebo Ulu, Komandan Daerah Militer Tebo Ulu, Badan Pembinaan Desa Sumay; NGO & press: Tuo Sumay cultural leader, LSM Merah Putih, Jambi Express; Worker union: Konfederasi Serikat Pekerja Seluruh Indonesia (SPSI); Medical facility: Puskesmas Serai Serumpun, Puskesmas Sumay</p>	
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		
<p>6.3.1</p>	<p>The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.</p> <p>- Major compliance -</p> <p>BungoTebo POM and Estate: The Certificate Holder has had a mechanism to handle complaint from external party, in form of "Prosedur Penanganan Keluhan, Dokumen No. SOP AA-GL-5005-R0 01". Complaint from internal stakeholder was regulated as per "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan, Dokumen No.SOP.AA-HR-308 0.5-R0". Also, a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015 is available. The mechanism mentioned policy to maintain anonymity of complainant or whistleblower (if requested).</p> <p>Scheme Smallholder: Cooperative has prepared mekanisme on ommunication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" dated 2 December 2016, available in "Buku Panduan dan Catatan Petani" page 19. Smallholder refers to "Standar Operating Procedure Penanganan Konflik Lahan No.AA-GL-5003.1-R2" dated 8 May 2015. Cooperative has prepared mekanisme on communication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" produced January 2019. This document being part of List of Publicly</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Available Document in KUD Barokah, KUD Sawit Makmur Bersama, KUD Sawit Keluarga Sejahtera, KUD Sawit Tanduk Perkasa, KUD Sawit Sumay Makmur.</p> <p>The mechanism in form of flowchart: Stakeholder and/or information requestor can verbally ask/write down in guest list and recorded in record book. Response upon information request by cooperative chairman or upon discussion for consensus. The decision was informed both verbal and in written to stakeholder and/or requesting party. Administration officer from cooperative records down any decision being informed to stakeholder and/or smallholder member.</p>	
<p>6.3.2</p> <p>There shall be records of process and outcome of dispute resolution.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT. Rigunas Agri Utama has appointed public relation officer to reform the complaint and respond administrative system. Public relation officer is responsible to record any complaint, provide respond for complaint and record the resolution process; should any complaint come from external stakeholder. Each Assistant is responsible to record and follow up complaint from internal stakeholder. PT Rigunas Agri Utama is able to demonstrate complaint/dispute register under "Logbook Keluhan Stakeholder" and internal complaint/dispute register "Logbook Keluhan Internal".</p> <p>Based on "Logbook Keluhan Stakeholder" period January – August 2018, no complaint or disputes are present.</p> <p>Based on interviews with Tebo Regency Environmental Office on October 15, 2019, that there are complaints from the "NGO Lembaga Pemantau, Penyelamat Lingkungan Hidup" (LP2LH). Based on the letter No. 14/LP2LH-TEBO/SOMASI/VII/2019 from the local NGO Lembaga Pemantau, Penyelamat Lingkungan Hidup Tebo Regency, the district environmentalists. Tebo on 29 July 2019 addressed to PT RAU and Cc to the minister of KLHK RI Jakarta, Kejagung RI Jakarta, Kejaksaan Negeri Tebo Regency and DPP LP2LH, subject: Somasi against the alleged waste disposal of PT RAU factory to the media environment. This alleged has conducted observation on 28 July 2019, and the result is:</p> <ul style="list-style-type: none"> ▪ In the replanting area found broken waste water pipes caused by replanting activities using the heavy-duty vehicle. ▪ In carrying out the activities of the stacking, we (LP2LH) argue that the PT RAU does not pay attention to the environmental licensing norms in which we see the flow of the river Luan children are buried in the time of oil palm planting activities 	<p>Comply</p>

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	<ul style="list-style-type: none"> ▪ There are still many trees found in palm oil that is not in accordance with the river Borders (Riparian). ▪ Due to the alleged pollution of the environment we have found that there have been victims of several communities Hamlet Tanjung and the village Tuo Sumay Kec. The Sumay District The Tebo is infected after using Batang Sumay River water which is used for bathing. ▪ The condition of the village's main road with dusty conditions so that it is disturbing and difficult to breathe, so that PT RAU obliged to flush the road but not implemented. <p>Furthermore, PT Rigunas Agri Utama conveyed this to the Environmental Office at Tebo Regency (DLH Kab. Tebo) on 29 July 2019. Representatives from DLH District of Tebo has observed on the ground and take a sampling of water allegedly polluted by the factory waste on August 21, 2019 as many as 5 samples. The sample was taken at several location, ther are: the water of the Rotan River, Salak Sengkilan water river, water drain drainage plant, water Blok B19A Trench, non LA water well and water well monitored (sumur pantau) of LA. The samples is to be conducted laboratory checks at DLH District of Tebo Laboratory.</p> <p>By the presence of somasi from the NGO LP2LH on July 29, 2019 the above, then held mediation between DPD LP2LH Tebo Regency with PT Rigunas Agri Utam on September 11, 2019, with the results of mediation recorded in the Berita Acara Hasil Mediasi antara DPD LP2LH Kab. Tebo dengan PT Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> - From laboratory test results, its showed that samples tested from waste factory, it is not proven to be, because of the characteristics of between samples tested with waste factory is very different. - There is some of sample test is exceeds of quality standard of TSS and COD, this is because ther are replanting activities. - PT RAU will make a concerted effort to do planting "cover crop" to anticipate the problem TSS and COD in excess of quality standard. - LP2LH appealed to the PT RAU to pay attention to community complaints realted the palntataion activities. - Both of PT RAU and LP2LH accept the results of mediation that facilitated by the Environment Department of Tebo Regency and will not be demanding each other in any form. 	

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		<p>Berita Acara Hasil Mediasi antara DPD LP2LH Kab. Tebo dengan PT Rigunas Agri Utama above has been agreed by both parties between PT RAU and NGO LP3LH Tebo Regency.</p> <p>Scheme Smallholders: Based on stakeholder consultation with village heads, government officials and other stakeholders it was noted that KUD Barokah, KUD Sawit Makmur Bersama, KUD Sawit Keluarga Sejahtera, KUD Sawit Tanduk Perkasa, KUD Sawit Sumay Makmur, there was no complaint or disputes during 2019.</p>	
<p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p>- Major compliance –</p>	<p>Bungo Tebo POM and Estate: The Certificate Holder has had a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Scheme Smallholder: For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders. The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS</p>	Comply

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		<p>program since 1999 up to 2001. The PIR-Trans program was allocated on state land. Based on communication with Lembaga Adat Tuo Sumay, the allocated land was not customary.</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p>	
6.4.2	<p>A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>The Certificate Holder has had a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Scheme Smallholder:</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p> <p>The legal ownership for smallholcer members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated from state land, there was no compensation made to local and/or customary landowners.</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p>	Comply
6.4.3	<p>Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of</p>	<p>Bungo Tebo POM and Estate:</p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
<p>the participation of affected parties.</p> <p>- Major compliance –</p>	<p>Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo” dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per “Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha” dated 18 November 1993. Land historical is clearly describe in “Risalah Panitia-B” for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 – 2019 (up to September 2019).</p> <p>Scheme Smallholder:</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p> <p>There was no land compensation for smallholder to previous landowner. The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on state land by government.</p> <p>However, cooperatives recorded the transaction of land ownership between smallholders. Sample verified: “Surat Keterangan Pengurus KUD Sawit Sumay Makmur tentang Kepemilikan Kapling Hamparan 10, blok No.125 dari pemilik awal Suwardi kepada pemilik baru Budi” – statement from cooperative on land transaction from previous block owner Suwardi to new block owner Budi, dated 11 January 2019.</p> <p>Acknowledge by village administrator “Surat Keterangan Jual-Beli Tanah Kapling Desa Pinang Belai, dari Suwardi to Budi Hamparan 10, blok No.125, SP1” dated 11 January 2019 – signed by village head, current landowner (buyer), previous landowner (seller) and witnesses from surrounding block (north-south-east-west side).</p> <p>“Surat Keterangan Pengurus KUD Sawit Tanduk Perkasa tentang Kepemilikan Kapling Hamparan 56, blok No.1429 dari pemilik awal M. Ali kepada pemilik baru Iman R.” – statement from cooperative on land transaction from previous block owner M. Ali to new block owner Iman R, dated 8 March 2019.</p>	

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	<p>Acknowledge by village administrator "Surat Keterangan Jual-Beli Tanah Kapling Desa Sako Makmur, dari M. Ali kepada Iman R.; Hamparan 56, blok No.1429, SP7" dated 8 March 2019 – signed by village head, current landowner (buyer), previous landowner (seller) and witnesses from surrounding block (north 1428-south 1427-east 1437-west 1430 side).</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p>																																							
<p>Criterion 6.5: 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>																																								
<p>6.5.1</p> <p>Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme smallholders: KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9)</p> <p>Company/Cooperative have established the minimum wage for worker based on governor decree, which updated on yearly base. The 2019 wage was based on "Surat Keputusan Gubernur Jambi No.1103/KEP.GUB/DISNAKERS-3.3/2018 tentang Penetapan Upah Minimum Provinsi Jambi Tahun 2019". The minimum wage, as per the decree was Rp. 2.423.889,16 per month for 7 hours per day and 40 hours per week. With piece rate of Rp. 96.956 per working day for daily workers.</p> <p>Based on review of payments slip in September 2019, there is no worker paid below minimum wages, e.g:</p> <p>Bungo Tebo Estate:</p> <table border="1" data-bbox="663 1118 1167 1388"> <tbody> <tr><td>UMP Prov. Jambi 2019</td><td></td></tr> <tr><td>Name : Afriani (PKWT)</td><td>25</td></tr> <tr><td>Gaji Pokok</td><td>Rp 2.233.449</td></tr> <tr><td>Beras</td><td>Rp 142.500</td></tr> <tr><td>lembur</td><td></td></tr> <tr><td>BPJS Tek</td><td></td></tr> <tr><td>BPJS Kes</td><td></td></tr> <tr><td></td><td>Rp 2.375.949</td></tr> <tr><td>Potongan</td><td></td></tr> <tr><td>BKAI</td><td></td></tr> </tbody> </table> <table border="1" data-bbox="1196 1118 1700 1388"> <tbody> <tr><td>UMP Prov. Jambi 2019</td><td></td></tr> <tr><td>Rp 2.423.889,16</td><td>Rp 96.956</td></tr> <tr><td colspan="2"><i>Slip gaji Periode Sept 2019</i></td></tr> <tr><td>Name : Susanto (PHL)</td><td>28</td></tr> <tr><td>Gaji Pokok</td><td>Rp 2.714.756</td></tr> <tr><td>Beras</td><td></td></tr> <tr><td>Lembur/Premi</td><td>Rp 880.000</td></tr> <tr><td>BPJS Tek</td><td></td></tr> <tr><td>BPJS Kes</td><td></td></tr> </tbody> </table>	UMP Prov. Jambi 2019		Name : Afriani (PKWT)	25	Gaji Pokok	Rp 2.233.449	Beras	Rp 142.500	lembur		BPJS Tek		BPJS Kes			Rp 2.375.949	Potongan		BKAI		UMP Prov. Jambi 2019		Rp 2.423.889,16	Rp 96.956	<i>Slip gaji Periode Sept 2019</i>		Name : Susanto (PHL)	28	Gaji Pokok	Rp 2.714.756	Beras		Lembur/Premi	Rp 880.000	BPJS Tek		BPJS Kes		<p>Comply</p>
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	POGSI BPJS Tek Rp 47.519 BPJS Kes Rp 25.648 Jaminan Pensiun Koperasi Rp 73.167 Gaji Diterima Rp 2.302.782 Name : Afriani (PKWT) 25 Gaji Pokok Rp 2.233.449 Beras Rp 142.500		Sub Total Rp 3.594.756 Potongan BPJS Tek Rp 48.477 BPJS Kes Jaminan Pensiun PLN Koperasi Sub Total Rp 48.477 Gaji Diterima Rp 3.546.279		
	UMP Prov. Jambi 2019 Rp 2.423.889,16 Rp 96.956 <i>Slip gaji Periode Sept 2019</i> Name : Adi Saputra (PHL) 24 Gaji Pokok Rp 2.326.944 Beras Lembur/Premi Rp 880.000 BPJS Tek BPJS Kes Sub Total Rp 3.206.944 Potongan BPJS Tek Rp 48.477 BPJS Kes Jaminan Pensiun PLN Koperasi Sub Total Rp 48.477 Gaji Diterima Rp 3.158.467	UMP Prov. Jambi 2019 Rp 2.423.889,16 Rp 96.956 <i>Slip gaji Periode Sept 2019</i> Name : Adi Putra S. (PHL) 24 Gaji Pokok Rp 2.326.944 Beras Lembur/Premi Rp 880.000 BPJS Tek BPJS Kes Sub Total Rp 3.206.944 Potongan BPJS Tek Rp 48.477 BPJS Kes Jaminan Pensiun PLN Koperasi Sub Total Rp 48.477 Gaji Diterima Rp 3.158.467			

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	<p>Bungo Tebo Mill</p> <table border="1" data-bbox="667 459 1234 1002"> <tr> <td>UMP Prov. Jambi 2019</td> <td></td> <td></td> </tr> <tr> <td>Rp 2.423.889,16</td> <td>Rp</td> <td>96.956</td> </tr> <tr> <td colspan="3"><i>Slip gaji Periode Sept 2019</i></td> </tr> <tr> <td>Name : Antoni Rumanda (PHL)</td> <td></td> <td>20</td> </tr> <tr> <td>Gaji Pokok</td> <td>Rp</td> <td>1.939.111</td> </tr> <tr> <td>Beras</td> <td></td> <td></td> </tr> <tr> <td>Lembur/Premi</td> <td>Rp</td> <td>1.760.105</td> </tr> <tr> <td>BPJS Tek</td> <td></td> <td></td> </tr> <tr> <td>BPJS Kes</td> <td></td> <td></td> </tr> <tr> <td>Sub Total</td> <td>Rp</td> <td>3.699.216</td> </tr> <tr> <td colspan="3">Potongan</td> </tr> <tr> <td>BPJS Tek</td> <td>Rp</td> <td>48.478</td> </tr> <tr> <td>BPJS Kes</td> <td>Rp</td> <td>24.230</td> </tr> <tr> <td>Jaminan Pensiun</td> <td></td> <td></td> </tr> <tr> <td>PLN</td> <td></td> <td></td> </tr> <tr> <td>Koperasi</td> <td></td> <td></td> </tr> <tr> <td>Sub Total</td> <td>Rp</td> <td>72.708</td> </tr> <tr> <td>Gaji Diterima</td> <td>Rp</td> <td>3.626.508</td> </tr> </table> <table border="1" data-bbox="1267 459 1749 1002"> <tr> <td>UMP Prov. Jambi 2019</td> <td></td> <td></td> </tr> <tr> <td>Rp 2.423.889,16</td> <td>Rp</td> <td>96.956</td> </tr> <tr> <td colspan="3"><i>Slip gaji Periode Sept 2019</i></td> </tr> <tr> <td>Name : Lusi Berdiana (PHL)</td> <td></td> <td>25</td> </tr> <tr> <td>Gaji Pokok</td> <td>Rp</td> <td>2.423.889</td> </tr> <tr> <td>Beras</td> <td></td> <td></td> </tr> <tr> <td>Lembur/Premi</td> <td>Rp</td> <td>1.541.204</td> </tr> <tr> <td>BPJS Tek</td> <td></td> <td></td> </tr> <tr> <td>BPJS Kes</td> <td></td> <td></td> </tr> <tr> <td>Sub Total</td> <td>Rp</td> <td>3.965.093</td> </tr> <tr> <td colspan="3">Potongan</td> </tr> <tr> <td>BPJS Tek</td> <td>Rp</td> <td>48.477</td> </tr> <tr> <td>BPJS Kes</td> <td>Rp</td> <td>24.239</td> </tr> <tr> <td>Jaminan Pensiun</td> <td></td> <td></td> </tr> <tr> <td>PLN</td> <td></td> <td></td> </tr> <tr> <td>Koperasi</td> <td></td> <td></td> </tr> <tr> <td>Sub Total</td> <td>Rp</td> <td>72.716</td> </tr> <tr> <td>Gaji Diterima</td> <td>Rp</td> <td>3.892.377</td> </tr> </table> <p>"Rapel" payment has been made to the PKWT employees, namely:</p> <ul style="list-style-type: none"> – On 29 May 2019 to payment period from January – April 2019, based on Bukti Pengeluaran Bank, No. AC: 01g0.01.00047730.6, voucher No. 1548 RP 2.285.422,- – Dated 27 September 2019 for the payment period from May – September 2019, based on Bukti Pengeluarna Bank, No. AC: 01g0.01.00047730.6, voucher No. 1548 RP 2.856.765,- 	UMP Prov. Jambi 2019			Rp 2.423.889,16	Rp	96.956	<i>Slip gaji Periode Sept 2019</i>			Name : Antoni Rumanda (PHL)		20	Gaji Pokok	Rp	1.939.111	Beras			Lembur/Premi	Rp	1.760.105	BPJS Tek			BPJS Kes			Sub Total	Rp	3.699.216	Potongan			BPJS Tek	Rp	48.478	BPJS Kes	Rp	24.230	Jaminan Pensiun			PLN			Koperasi			Sub Total	Rp	72.708	Gaji Diterima	Rp	3.626.508	UMP Prov. Jambi 2019			Rp 2.423.889,16	Rp	96.956	<i>Slip gaji Periode Sept 2019</i>			Name : Lusi Berdiana (PHL)		25	Gaji Pokok	Rp	2.423.889	Beras			Lembur/Premi	Rp	1.541.204	BPJS Tek			BPJS Kes			Sub Total	Rp	3.965.093	Potongan			BPJS Tek	Rp	48.477	BPJS Kes	Rp	24.239	Jaminan Pensiun			PLN			Koperasi			Sub Total	Rp	72.716	Gaji Diterima	Rp	3.892.377	
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<p>6.5.2</p>	<p>Collective Labor Agreement /Company Regulation, in accordance with the manpower regulations, shall be available in</p> <p>Bungo Tebo POM and Estate: Worker Agreement between PT Rigunas Agri Utama and labour union is referred into collective working agreement (PKB 2018 – 2020), between BKS-PPS (collective community of oil palm company)</p>	<p>Comply</p>																																																																																																												

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<p>understandable language; and explained by the management or Labor Union to the workers.</p> <p>- Major compliance -</p>	<p>and PP. FSP. PPSPSI (collective workere union organization) in Sumatra island. Collective Work Agreement (PKB) was registered as per "Surat Direktur Persyaratan Kerja, Kesejahteraan dan Analisa Diskriminasi Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja - Kementerian Tenaga Kerja RI No.KEP.88/PHIJSK-PKKAD/PKB/VI/2015 tentang Pendaftaran PKB antara BKS-PPS dengan PP.FSP.PP-SPSI" dated 8 April 2019.</p> <p>Based on document review, it was noted that term and condition, such as working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc, are covered in PKB and contracts which have been signed by all workers. Collective working agreement made in the 'Bahasa Indonesia' and understood by all workers.</p> <p>Company has set work agreement for daily worker (PHL) and PKWT, such as:</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja Karyawan PHL No. 2707/KBT/RAU/SPKHL/II/01/2019, on behalf of Susanto Bin Ripai (Bungo Tebo Estate) valid until 31/12/2019. - Surat Perjanjian Kerja Karyawan PHL No. 13927/KBT/RAU/SPKHL/II/01/2019, on behalf of Adi Saputra (Bungo Tebo Estate) valid until 31/12/2019. - Surat Perjanjian Kerja Karyawan PHL No. 088/KBT/RAU/SPKHL/II/01/2019, on behalf of Adi Putra Sinaga (Bungo Tebo Estate) valid until 31/12/2019. - Surat Perjanjian Kerja Karyawan PHL No. 003/PBT/RAU/SPKHL/07/2019, on behalf of Antoni Ramanda (factory employees bungo tebo) ends tgl 01/07/2020. - Surat Perjanjian Kerja Untuk Jangka Waktu Tertentu No. 002/HRD-RO3/SPK/X/2018, Dated 1 October 2018; Namely Afriani valid until 1 November 2019 <p>Scheme smallholders:</p> <p>Work agreement between cooperative and staff available in "Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI", s.g:</p> <ul style="list-style-type: none"> - KOPERASI Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SPK/KUD-SSM/IV/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Sumay Makmur, namely Damanhuri (Sekertaris KOPERASI Sawit Sumay Makmur), dated 1 April 2019. 	

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	<ul style="list-style-type: none"> - KOPERASI Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SK/KUD-BRKH/I/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI BAROKAH, namely Rahmat (Bendahara KOPERASI Sawit Sumay Makmur), dated 1 January 2019. - KOPERASI Sawit Keluarga Sejahtera – Surat Perjanjian Kerja No 03/SK/KUD-SKS/II/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Keluarga Sejahtera, namely Khamsiyah (Bendahara KOPERASI Sawit Keluarga Sejahtera), dated 1 January 2019. - KOPERASI Sawit Tanduk Perkasa – Surat Perjanjian Kerja No 016/SK/KUD-STP/IV/2018 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Tanduk Perkasa, namely Yadi Efendi (Bendahara KOPERASI Sawit Tanduk Perkasa), dated 1 April 2019. <p>Inside the work contract covers employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Contract is made available in Bahasa Indonesia and understood by both parties.</p>	
<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 such public facilities are unavailable or inaccessible.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has provided facility for employee as in “Inventarisasi Bangunan dan Infrastruktur”, updated in July 2018, such as:</p> <ul style="list-style-type: none"> – Kantor afdeling (4 units) – Guest house (2 units) – Staff housing (5 units) – Poliklinik (1 unit): <p>Permit for company clinic: “Surat Kantor Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu tentang Surat Izin Penyelenggaraan Klinik Rawat Jalan Pelayanan Medik Dasar No.445/01/SIK/KPMD-PPT/2015 untuk PT. Rigunas Agri Utama, responsible by dr.Arde Hidayat”, dated 16 February 2015.</p> <p>“Surat Izin Praktek Dokter No.446/09/DU/KPMD-PPT/2016 untuk dr. Arde Hidayat” dated 4 April 2016-24 February 2021.</p> <p>“Surat Izin Praktek Dokter No.446/048/DU/DPM-PTSP-K.UKM/2019 on behalf of dr. Yudi Chandra” dated 2 August 2019 and valid until 30 March 2024.</p>	<p>Comply</p>

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		<ul style="list-style-type: none"> - Masjid/Mosque (3 units) - Balai Karyawan (3 units) - Koperasi (1 unit) - D2 type employee housing (38 units); - E4 type employee housing (216 units); - E1 employee housing of 85 units; - Mill worker housing of 84 units; - School buses (4 units) - Sport facilities. <p>Housing for worker was adequate. Housing compound was completed with electricity and clean water (from bore well). During visit, the condition of housing was relatively good.</p> <p>Scheme smallholders Workers that worked in scheme smallholder plantation area was lived in their villages. Clean water need has been fulfilled through water well and buying gallon water.</p>	
6.5.4	<p>There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate: Company gave access to outside merchant to sell primary need and/or basic need. Another night fair usually available in Dusun Tanjung Dani between Kebun Bukit Harapan and Sungai Ranau, not far from housing location. Basic needs also available in Pasar Teluk Singkawang, Kecamatan Sumay (less than 7 km).</p> <p>Scheme smallholders: Scheme smallholder lives in the villages surrounding the plantation. The basic need for farmers can be accesses easily, since these worker lives outside the plantation.</p>	Comply
Criterion 6.6:			

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<p>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.</p>		
<p>6.6.1</p> <p>A record of the company’s policy in understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Freedom of association policy documented in “Kebijakan perusahaan, dated 1st December 2014” which state that: “respect all employee to form and be part of trade union of their choice and to bargain collectively.” Freedom of association policy is written in Bahasa Indonesia, so that all employees can understand.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy “Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> - On 7 May 2019 location in Division IV was attended by 11 workers - On 9 July 2019 location in Division II was attended by 25 workers - On 23 July 2019 location in Division III was attended by 17 workers - On 7 August 2019 location in Division I was attended by 25 workers <p>Worker union of PT. Rigunas Agri Utama has been established and acknowledged by “Dewan Pimpinan Cabang Konfederasi Serikat Pekerja Seluruh indonesia” as per “Surat Keputusan No.001/SK/PUK/X/2018 tentang Pengesahan Komposisi dan Personalia Pimpinan Unit Kerja (PUK) KSPSI PT. Rigunas Agri Utama, Desa Tou Sumay, Kecamatan Sumay, Kabupaten Tebo masa bakti 2018 – 2019” dated 11st October 2019. Worker union of PT Rigunas Agri Utama has also been registered to Manpower Agency in Tebo Regency based on letter no 02/SP-SB/HISK/2013, dated 9th September 2013.</p> <p>Scheme smallholders:</p> <p>Cooperative has defined the policy related to freedom of association has been established in “Kebijakan Koperasi” updated on 2nd January 2017 in poin 9 mentioned that “Menghormati hak asasi manusia dengan</p>	<p>Comply</p>

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	<p><i>memperlakukan seluruh karyawan KUD maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur”</i></p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> - In Koperasi Sawit Tanduk Perkasa has conducted on 8th March 2019, was attended by 17 members of smallholder. - In Koperasi Sawit Keluarga Sejahtera has conducted on 8th March 2019 was attended by 12 smallholders member. - In KOPERASI Barokah has conducted on 7th January 2019 was attended by 27 smallholders member - In KOPERASI Sawit Makmur Bersama has conducted on 8 January 2019 was attended by 18 smallholders member and on 7 January 2019 was attended by 20 smallholders member - In KOPERASI Sawit Sumay Makmur has conducted on 8 January 2019 was attended by 23 smallholders member. 	
<p>6.6.2</p> <p>Records of meetings with labor unions or workers representatives shall be available.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Records of meeting with labour unions have documented. Evidence seen:</p> <ul style="list-style-type: none"> ▪ Program of meeting between SPSI and Management of PT Rigunas Agri Utama Bungo Tebo Group year 2019 ▪ Minutes of meetings with main labour unions or workers representatives been documented, e.g: <ul style="list-style-type: none"> - Minute of Notulen between PUK-SPSI PT Rigunas Agri Utama and Management on 11th April 2019, agenda: discussion of cash report for SPSI funds and also discussed about annual entertainment event for employee (called: <i>Manisan</i>). - Minute of Notulen between PUK-SPSI PT Rigunas Agri Utama and Management on 28th January 2019, agenda: Replacement of SPSI Treasurer and Tournament Committee formation and the 	<p>Comply</p>

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		<p>POR officer.</p> <ul style="list-style-type: none"> Minute of Notulen between PUK-SPSI PT Rigunas Agri Utama and Management on 23th September 2019, agenda: meeting to discuss forming the LKS bipartite. <p>Scheme smallholders: No worker union. Most of the workers are field worker, which as temporary worker</p>	
<p>Criterion 6.7: Children are not employed or exploited.</p>			
6.7.1	<p>There shall be documented evidence that minimum age requirements are met.</p> <ul style="list-style-type: none"> Major compliance – 	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas AGri Utama has own policy signed by management on 1st December 2014 that stated that: It is not allowed all children to work in every activities/processes in company.</p> <p>Company also has a procedure AA-HR-305-2-00 – Recruitment and Selection which stated that every candidate must have identity card "(KTP), Kartu Keluarga, Surat Nikah (if married)".</p> <p>The company has own policy signed by management on 1 December 2014 that stated children is not allowed to work in every activities/processes in company. Communication of the policy to Bungo Tebo Estate worker: sampled on 7 May 2019, "Sosialisasi Larangan Mempekerjakan Anak di Bawah Umur" to 12 harvesters.</p> <p>Document seen:</p> <ul style="list-style-type: none"> Based on document review as listed in "Daftar Karyawan PT Rigunas Agri Utama Kebun dan Pabrik Bungo tebo" updated in September 2019, there are no underage workers. List of workers did not show any worker under 18 years old when they joined the company. PMKS Bungo Tebo – the youngest worker in Tebo POM namely Dion Juniadi (date of birth 16 July 1999), joint date on 20 April 2019 (when 19 years old and 10 months). Bungo Tebo Estate – the youngest worker in Bungo Tebo Estate namely Resi Lestari, date of birth 16 April 1995 and joint date on 7 January 2019 (22 years old and 9 months) 	Comply

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	<p>Scheme smallholders:</p> <p>Cooperative has defined the policy to prohibit underage worker has been established in "<i>Kebijakan Koperasi</i>" updated on 2nd January 2017 in poin 10 mentioned that "<i>Melarang anak-anak bekerja dalam setiap kegiatan operasional kebun</i>"</p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> - In Koperasi Sawit Tanduk Perkasa has conducted on 8th March 2019, was attended by 17 members of smallholder. - In Koperasi Sawit Keluarga Sejahtera has conducted on 8th March 2019 was attended by 12 smallholders member. - In KOPERASI Barokah has conducted on 7th January 2019 was attended by 27 smallholders member - In KOPERASI Sawit Makmur Bersama has conducted on 8 January 2019 was attended by 18 smallholders member and on 7 January 2019 was attended by 20 smallholders member - In KOPERASI Sawit Sumay Makmur has conducted on 8 January 2019 was attended by 23 smallholders member. <p>Smallholder cooperative/KOPERASI has established policy related to minimum age of worker as in "<i>Kebijakan Koperasi Sawit Keluarga Sejahtera</i>" dated 2 January 2017, stated "<i>Melarang anak-anak bekerja dalam setiap kegiatan operasional perkebunan</i>" – to prohibit children to work in all aspect of plantation operation. This policy continuously disseminated to smallholder member: on 8 March 2019.</p> <p>Smallholder Koperasi Sawit Keluarga Sejahtera, Koperasi Sawit Makmur Bersama, Koperasi Barokah, Kokperasi Sawit Tanduk Perkasa and Koperasi Sawit Sumay Makmur has established policy related to minimum age of worker as in "<i>Kebijakan Koperasi Sawit Tanduk Perkasa</i>" dated 2 January 2017, stated "<i>Melarang anak-anak bekerja dalam setiap kegiatan operasional perkebunan</i>" – to prohibit children to work in all aspect of plantation operation. This policy continuously disseminated to smallholder member: on 12 March 2019 for 12 members.</p> <p>During visit to Koperasi Sawit Keluarga Sejahtera, Koperasi Sawit Makmur Bersama, Koperasi Barokah, Kokperasi Sawit Tanduk Perkasa and Koperasi Sawit Sumay Makmur as well as interview with respective</p>	

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	<p>sampled smallholder. All of the sampled smallholder was performing plantation activities themselves. The audit team did not found: worker under 18 year old or children following their parent to oil palm block. The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> - In Koperasi Sawit Tanduk Perkasa has conducted on 8th March 2019, was attended by 17 members of smallholder. - In Koperasi Sawit Keluarga Sejahtera has conducted on 8th March 2019 was attended by 12 smallholders member. - In KOPERASI Barokah has conducted on 7th January 2019 was attended by 27 smallholders member - In KOPERASI Sawit Makmur Bersama has conducted on 8 January 2019 was attended by 18 smallholders member and on 7 January 2019 was attended by 20 smallholders member - In KOPERASI Sawit Sumay Makmur has conducted on 8 January 2019 was attended by 23 smallholders member. 	
<p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>		
<p>6.8.1</p> <p>A company's policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>The company has Equal Opportunities policy as documented in Company Policy "Kebijakan Perusahaan", dated 1st December 2014 stated: "To treat equal for all employee in term of recruitment, work performance, and representative without discrimination on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age". The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g:</p> <ul style="list-style-type: none"> - On 7 May 2019 location in Division IV was attended by 11 workers - On 9 July 2019 location in Division II was attended by 25 workers 	<p>Comply</p>

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	<ul style="list-style-type: none"> - On 23 July 2019 location in Division III was attended by 17 workers - On 7 August 2019 location in Division I was attended by 25 workers <p>Scheme smallholders:</p> <p>Cooperative has defined the policy on equal opportunity and treatment for work has been established in <i>"Kebijakan Koperasi" updated on 2nd January 2017 in poin 9 mentioned that "Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KUD maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur"</i></p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> - In Koperasi Sawit Tanduk Perkasa has conducted on 8th March 2019, was attended by 17 members of smallholder. - In Koperasi Sawit Keluarga Sejahtera has conducted on 8th March 2019 was attended by 12 smallholders member. - In KOPERASI Barokah has conducted on 7th January 2019 was attended by 27 smallholders member - In KOPERASI Sawit Makmur Bersama has conducted on 8 January 2019 was attended by 18 smallholders member and on 7 January 2019 was attended by 20 smallholders member - In KOPERASI Sawit Sumay Makmur has conducted on 8 January 2019 was attended by 23 smallholders member. <p>Smallholder cooperative/KOPERASI has established policy to prohibit discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.</p> <p><i>"Kebijakan Koperasi Barokah" dated 9 January 2017, stated "Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KOPERASI maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal negara,</i></p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur” – to respect human rights by treating all cooperative worker and smallholder member in equal manner, in terms of recruitment, evaluation, work condition and work environment inspite of race, caste, national origin, religion/belief, disability, gender, sexual orientation, worker union membership, political view, or age. This policy disseminated to smallholder member: on 7 January 2019 for 27 members.</p> <p>Smallholder cooperative/”Koperasi Sawit Keluarga Sejahtera” has established policy related to anti-discrimination as in ”Kebijakan Koperasi Tunas Harapan” dated 2 January 2017. Policy communicated to smallholder members on 8 March 2019 to 18 members.</p>	
<p>6.8.2</p> <p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Company has provided a policy in relation to this indicator requirement, stated in ”Kebijakan Perusahaan”, dated 1st December 2014. During the audit, there is no issue has found with regards to discrimination against local communities, women, and migrant workers.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy ”Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> - On 7 May 2019 location in Division IV was attended by 11 workers - On 9 July 2019 location in Division II was attended by 25 workers - On 23 July 2019 location in Division III was attended by 17 workers - On 7 August 2019 location in Division I was attended by 25 workers <p>Company has provided evidence that employees and groups including local communities, women, and migrant workers have not been discriminated. List of employee of PT Rigunas Agri Utama updated 2017, shows equal opportunity and right without discrimination on race, religion, age, national origin.</p> <p>During audit, all worker, including contract worker was given housing, rice benefit, work insurance, working tools and PPE – similar treatment with permanent worker.</p>	<p>Comply</p>

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	<p>Scheme smallholders:</p> <p>Cooperative has defined the policy to provide equal opportunity policy to all worker as written in "Kebijakan Koperasi" updated on 2 January 2017.</p> <p>During field audit, it was not found discrimination against gender, tribe, religion and race. All worker has the right and obligation in accordance to the type of work.</p>	
<p>6.8.3</p> <p>Records of evidence that equal opportunity and treatment for work shall be available.</p> <p>– Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Dissemination on company policy for Bungo Tebo POM, dated 8 August 2018 for 25 Bungo Tebo POM worker.</p> <p>Dissemination on company policy for Bungo Tebo POM, dated 12 July 2018 for 25 Bungo Tebo POM worker. Sampled worker: Royal Andi Panggabean, Sinta Rukun Barus. Records of evidence that equal opportunity and treatment for work available. Evidences seen:</p> <p>Recruitment process was documented in procedure AA-HR-305-2-00 – Recruitment and Selection. Based on that procedure, it was described that recruitment and promotion of workers based on worker competency.</p> <p>The process of recruitment, selection and promotion was conducted transparently, and this was communicated to of candidates.</p> <p>Based on interview with manajemen and document verification, that on period 2019 there is no process for recruitment.</p> <p>The company can also prove that policies on opportunities and treatment are applied to all employees, namely by the appointment of PHL employees into permanent employees or promotion of employees, for example:</p> <ul style="list-style-type: none"> – Memorandum of RH Plantation III No. 145/HR-RO3/MEMO/SK/07/2019 dated 31 July 2019 concerning employee promotion on behalf of Azwardi (Bungo Tebo Garden) since August 1, 2019. – Memorandum of RH Plantation III No. 143/HR-RO3/MEMO/SK/07/2019 dated 31 July 2019 concerning employee promotion on behalf of Darman Yus Bulolo (Bungo Tebo Garden) since August 1, 2019. – Memorandum of RH Plantation III No. 144/HR-RO3/MEMO/SK/07/2019 dated July 31, 2019 on employee promotion on behalf of Rama Nduru (Bungo Tebo Garden) since August 1, 2019. 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Scheme smallholders:</p> <p>Recruitment was based on procedure, whereby mentioned recruitment and promotion of workers based on worker competency.</p> <p>Based on visit and interview to Koperasi Sawit Keluarga Sejahtera, Koperasi Sawit Makmur Bersama, Koperasi Barokah, Koperasi Sawit Tanduk Perkasa and Koperasi Sawit Sumay Makmur and the sampled smallholder: smallholder No. 328, 329, 1454, 1457, 668, 669, 0704 and 989, it found that no discrimination. The smallholder member at each cooperative comes from different places: Java, Jambi, Malay, Batak, and other region.</p> <p>Cooperative/scheme smallholder KOPERASI Tani Mandiri implement uniform tarif for service provision to smallholder member; example: FFB transport sets at Rp.200/kg. All member of Koperasi Sawit keluarga Sejahtera, farmer group/"hamparan 52" received PPE from company/cooperative, such as helmet and sickle cover. Cooperative provides palm hook and sickle to smallholder member on 12 Juni 2019 at Koperasi Sawit Makmur Bersama. On 15 July 2019 at Koperasi Sawit Keluarga Sejahtera. At Koperasi Sawit Tanduk Perkas, smallholder member received working tools such as uniform, sickle and grinding stone dated 8 July 2019.</p>	
<p>Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		
<p>6.9.1</p>	<p>A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce.</p> <p>- Major compliance –</p> <p>Bungo Tebo POM and Estate:</p> <p>Policy to prevent sexual and all other forms of harassment and violence determined in "Kebijakan Perusahaan Asian Agri tanggal 1 Desember 2014". Chapter 15 stated company prevent sexual harassment and any form of violence to women and protect the reproductive rights.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g:</p> <ul style="list-style-type: none"> - On 7 May 2019 location in Division IV was attended by 11 workers - On 9 July 2019 location in Division II was attended by 25 workers 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - On 23 July 2019 location in Division III was attended by 17 workers - On 7 August 2019 location in Division I was attended by 25 workers <p>PT Rigunas Agri Utama has formed A Gender Committee since April 2013 and consist of Chairwoman, vice chairwoman, secretary vice secretary, members. Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 23 March 2018 for 9 Bungo Tebo Estate workers: Hamdani, A Rahman, Afrizal, Riri, Ansori, T. Ahmadi, Suherman.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 17 June 2018 for 7 Bungo Tebo Estate workers: Runggu, Rolies, Nurhayati, Nurtiani, Lismarleni, Nurjanah, Uliah.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 22 September 2018 for 16 Bungo Tebo Estate workers.</p> <p>Scheme smallholders:</p> <p>KUD Sawit Tanduk Perkasa have “Kebijakan KUD Sawit Tanduk Perkasa” signed on 8 January 2018; in point 11 stating “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>KUD Sawit Sumay Makmur have “Kebijakan KUD Sawit Sumay Makmur” signed on 8 January 2018; in point 11 stating “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>KUD Sawit Keluarga Sejahtera have “Kebijakan KUD Sawit Keluarga Sejahtera” signed on 8 January 2018; in point 11 stating “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>Koperasi Barokah have “Kebijakan Koperasi Barokah” signed on 7 January 2018; the policy stipulates “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>The policy has been communicated to smallholder farmer/member , e.g:</p> <ul style="list-style-type: none"> - In Koperasi Unit Desa Sawit Keluarga Sejahtera, has conducted communication of Prohibit Sexual Harassment policy on 8 March 2019, was attended by 10 smallholders, including the treasurer and representative from <i>Hamparan 52, 53</i>. - In Koperasi Unit Desa Sawit Tanduk Perkasa, has conducted communication of Sexual Harassment policy on 8 March 2019, was attended by 16 smallholders, representative from <i>Hamparan 54, 55, 56, 60, 64, 69, 95, 96</i>. 	
<p>6.9.2</p> <p>A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce.</p> <p>- Major compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>Policy to prevent sexual and all other forms of harassment and violence determined in “Kebijakan Perusahaan Asian Agri tanggal 1 Desember 2014”. Chapter 15 stated company prevent sexual harassment and any form of violence to women and protect the reproductive rights.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy “Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> - On 7 May 2019 location in Division IV was attended by 11 workers - On 9 July 2019 location in Division II was attended by 25 workers - On 23 July 2019 location in Division III was attended by 17 workers - On 7 August 2019 location in Division I was attended by 25 workers <p>Dissemination on company policy on preventing sexual harassment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 26 April 2019, was attended by 11 workers in Bungo Tebo</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Estate.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 20 September 2019 for 7 Bungo Tebo Estate workers: Runggu, Rolies, Nurhayati, Nurtiani, Lismarleni, Nurjanah.</p> <p>Scheme smallholders:</p> <p>Koperasi Barokah have “Kebijakan Koperasi Barokah” signed on 7 January 2018; the policy stipulates “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>KUD Sawit Tanduk Perkasa have “Kebijakan KUD Sawit Tanduk Perkasa” signed on 8 January 2018; in point 11 stating “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>KUD Sawit Sumay Makmur have “Kebijakan KUD Sawit Sumay Makmur” signed on 8 January 2018; in point 11 stating “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>KUD Sawit Keluarga Sejahtera have “Kebijakan KUD Sawit Keluarga Sejahtera” signed on 8 January 2018; in point 11 stating “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya” – to prevent sexual harassment and all form of violence against women and to protect women reproductive rights.</p> <p>The policy has been communicated to smallholder farmer/member , e.g:</p> <ul style="list-style-type: none"> - In Koperasi Unit Desa Sawit Keluarga Sejahtera, has conducted communication of policy protection reproductive rights on 8 March 2019, was attended by 10 smallholders, including the treasurer and representative from <i>Hamparan 52, 53</i>. 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>- In Koperasi Unit Desa Sawit Tanduk Perkasa, has conducted communication of Protection Reproductive Rights policy on 8 March 2019, was attended by 16 smallholders, representative from <i>Hamparan 54, 55, 56, 60, 64, 69, 95, 96.</i></p>	
<p>6.9.3</p> <p>A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce.</p> <p>- Minor compliance –</p>	<p>Bungo Tebo POM and Estate:</p> <p>In case there is any harassment and violence, it will be reported to Gender Committee to be followed up. Documented procedure has been established to describe handling mechanism of sexual harassment case - SOP AA-HR-309.01-R0 dated 1st February 2009. Company has formed A Gender Committee since April 2013 and consist of Chairwoman, vice chairwoman, secretary, vice secretary, members.</p> <p>Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment.</p> <p>Based on interview with Gender Committee there were no a specific grievance of complainants in 2018 - 2019.</p> <p>Company has prepared a mechanism to handle complaint from external party, in form of "Prosedur Penanganan Keluhan, Dokumen No. SOP AA-GL-5005-R0 01". Complaint from internal stakeholder was regulated in "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan, Dokumen No.SOP.AA-HR-308 0.5-R0". Company has also prepared a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015.</p> <p>Based on interviews with Tebo Regency Environmental Office on October 15, 2019, that there are complaints from the "NGO Lembaga Pemantau, Penyelamat Lingkungan Hidup" (LP2LH). Based on the letter No. 14/LP2LH-TEBO/SOMASI/VII/2019 from the local NGO Lembaga Pemantau, Penyelamat Lingkungan Hidup Tebo Regency, the district environmentalists. Tebo on 29 July 2019 addressed to PT RAU and Cc to the minister of KLHK RI Jakarta, Kejagung RI Jakarta, Kejaksaan Negeri Tebo Regency and DPP LP2LH, subject: Somasi against the alleged waste disposal of PT RAU factory to the media environment. This alleged has conducted observation on 28 July 2019, and the result is:</p> <ul style="list-style-type: none"> ▪ In the replanting area found broken waste water pipes caused by replanting activities using the heavy-duty vehicle. 	<p>Comply</p>

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	<ul style="list-style-type: none"> ▪ In carrying out the activities of the stacking, we (LP2LH) argue that the PT RAU does not pay attention to the environmental licensing norms in which we see the flow of the river Lauan children are buried in the time of oil palm planting activities ▪ There are still many trees found in palm oil that is not in accordance with the river Borders (Riparian). ▪ Due to the alleged pollution of the environment we have found that there have been victims of several communities Hamlet Tanjung and the village Tuo Sumay Kec. The Sumay District The Tebo is infected after using Batang Sumay River water which is used for bathing. ▪ The condition of the village's main road with dusty conditions so that it is disturbing and difficult to breathe, so that PT RAU obliged to flush the road but not implemented. <p>Furthermore, PT Rigunas Agri Utama conveyed this to the Environmental Office at Tebo Regency (DLH Kab. Tebo) on 29 July 2019. Representatives from DLH District of Tebo has observed on the ground and take a sampling of water allegedly polluted by the factory waste on August 21, 2019 as many as 5 samples. The sample was taken at several location, ther are: the water of the Rotan River, Salak Sengkilan water river, water drain drainage plant, water Blok B19A Trench, non LA water well and water well monitored (sumur pantau) of LA. The samples is to be conducted laboratory checks at DLH District of Tebo Laboratory.</p> <p>By the presence of somasi from the NGO LP2LH on July 29, 2019 the above, then held mediation between DPD LP2LH Tebo Regency with PT Rigunas Agri Utam on September 11, 2019, with the results of mediation recorded in the Berita Acara Hasil Mediasi antara DPD LP2LH Kab. Tebo dengan PT Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> - From laboratory test results, its showed that samples tested from waste factory, it is not proven to be, because of the characteristics of between samples tested with waste factory is very different. - There is some of sample test is exceeds of quality standard of TSS and COD, this is because ther are replanting activities. - PT RAU will make a concerted effort to do planting "cover crop" to anticipate the problem TSS and COD in excess of quality standard. - LP2LH appealed to the PT RAU to pay attention to community complaints realted the palntataion activities. 	

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		<ul style="list-style-type: none"> - Both of PT RAU and LP2LH accept the results of mediation that facilitated by the Environment Department of Tebo Regency and will not be demanding each other in any form. <p>Berita Acara Hasil Mediasi antara DPD LP2LH Kab. Tebo dengan PT Rigunas Agri Utama above has been agreed by both parties between PT RAU and NGO LP3LH Tebo Regency.</p> <p>Scheme smallholders</p> <p>Cooperative has prepared mekanisme on communication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" produced January 2019. This document being part of List of Publicly Available Document in KUD Barokah, KUD Sawit Makmur Bersama, KUD Sawit Keluarga Sejahtera, KUD Sawit Tanduk Perkasa, KUD Sawit Sumay Makmur.</p> <p>Company has also prepared a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015.</p>	
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>FFB price for FFB supplier was available in Bungo Tebo POM Notice Board. FFB price as of 3 October 2019 was IDR 1,320.28/kg (planting age 21 – 24 years). Interview with a number of FFB suppliers, it was noted that FFB price they received was accordance to FFB price sets by company. FFB supplier or smallholders able to access the FFB price by phone and local media/notice board as well.</p> <p>FFB price for scheme smallholder determined by "Tim Penetapan Harga TBS Dinas Perkebunan Provinsi Jambi", released on weekly basis. There were current and past prices available such as prices for period 10 – 16 November 2017 based on "Hasil Rapat Penetapan Harga TBS Dinas Perkebunan Provinsi Jambi". Sample seen on "Hasil Rapat Penetapan Harga TBS Dinas Perkebunan Provinsi Jambi periode 27 September – 3 Oktober 2019" According to FFB price determination by Tim Penetapan Harga TBS Dinas Perkebunan Provinsi Jambi, FFB price for period 27 September – 3 Oktober 2019 are as follows:</p> <ul style="list-style-type: none"> - Planting age 10 – 20 year is IDR 1,362.87/kg 	Comply

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Criterion / Indicator		Assessment Findings				Compliance																																																																																																												
		<ul style="list-style-type: none"> - Planting age 21 – 24 year is IDR 1,320.28/kg - Planting age ≥ 25 year is IDR 1,256.80/kg <p>FFB price was informed to smallholder farmer via short message and disseminated the price determination letter to each KUD (smallholder) by Smallholder Manager.</p> <p>Another sample seen FFB purchase price sets by government:</p> <table border="1"> <thead> <tr> <th>Oil palm age</th> <th>Price Jan (Rp)</th> <th>Price Feb (Rp)</th> <th>Price Mar (Rp)</th> <th>Price Apr (Rp)</th> <th>Price May (Rp)</th> </tr> </thead> <tbody> <tr> <td rowspan="9">10-20 years</td> <td>3 Jan</td> <td>1-7 Feb</td> <td>1-7 Mar</td> <td>5-11 Apr</td> <td>3-9 May</td> </tr> <tr> <td>1,302.38</td> <td>1,471.35</td> <td>1,459,94</td> <td>1,414,87</td> <td>1,363.12</td> </tr> <tr> <td>4-10 Jan</td> <td>8-14 Feb</td> <td>8-14 Mar</td> <td>12-18 Apr</td> <td>10-16 May</td> </tr> <tr> <td>1,295.04</td> <td>1,469.22</td> <td>1,400,53</td> <td>1,424.90</td> <td>1,333.82</td> </tr> <tr> <td>11-17 Jan</td> <td>15-21 Feb</td> <td>15-21 Mar</td> <td>19-25 Apr</td> <td>17-23 May</td> </tr> <tr> <td>1,336.85</td> <td>1,500.55</td> <td>1,438,37</td> <td>1,429.58</td> <td>1,311.01</td> </tr> <tr> <td>18-24 Jan</td> <td>22-28 Feb</td> <td>22-28 Mar</td> <td>26 Apr-2 May</td> <td>24-30 May</td> </tr> <tr> <td>1,428.46</td> <td>1,490.35</td> <td>1,439,30</td> <td>1,392.52</td> <td>1,317.19</td> </tr> <tr> <td>25-31 Jan</td> <td></td> <td>29 Mar-4 Apr</td> <td></td> <td>31 May-6 Jun</td> </tr> <tr> <td>1,456.80</td> <td></td> <td>1,426,78</td> <td></td> <td>1,321.77</td> </tr> <tr> <td rowspan="9">21-24 years</td> <td>3 Jan</td> <td>1-7 Feb</td> <td>1-7 Mar</td> <td>5-11 Apr</td> <td>3-9 May</td> </tr> <tr> <td>1,263.11</td> <td>1,426.51</td> <td>1,414,88</td> <td>1,371,09</td> <td>1,320.76</td> </tr> <tr> <td>4-10 Jan</td> <td>8-14 Feb</td> <td>8-14 Mar</td> <td>12-18 Apr</td> <td>10-16 May</td> </tr> <tr> <td>1,255.97</td> <td>1,424.31</td> <td>1,357,23</td> <td>1,380.84</td> <td>1,292.49</td> </tr> <tr> <td>11-17 Jan</td> <td>15-21 Feb</td> <td>15-21 Mar</td> <td>19-25 Apr</td> <td>17-23 May</td> </tr> <tr> <td>1,296.36</td> <td>1,454.44</td> <td>1,393,85</td> <td>1,385.25</td> <td>1,270.37</td> </tr> <tr> <td>18-24 Jan</td> <td>22-28 Feb</td> <td>22-28 Mar</td> <td>26 Apr-2 May</td> <td>24-30 May</td> </tr> <tr> <td>1,385.07</td> <td>1,444.66</td> <td>1,394,60</td> <td>1,349.28</td> <td>1,276.42</td> </tr> <tr> <td>25-31 Jan</td> <td></td> <td>29 Mar-4 Apr</td> <td></td> <td>31 May-6 Jun</td> </tr> <tr> <td>1,412.04</td> <td></td> <td>1,382,58</td> <td></td> <td>1,280.69</td> </tr> </tbody> </table>				Oil palm age	Price Jan (Rp)	Price Feb (Rp)	Price Mar (Rp)	Price Apr (Rp)	Price May (Rp)	10-20 years	3 Jan	1-7 Feb	1-7 Mar	5-11 Apr	3-9 May	1,302.38	1,471.35	1,459,94	1,414,87	1,363.12	4-10 Jan	8-14 Feb	8-14 Mar	12-18 Apr	10-16 May	1,295.04	1,469.22	1,400,53	1,424.90	1,333.82	11-17 Jan	15-21 Feb	15-21 Mar	19-25 Apr	17-23 May	1,336.85	1,500.55	1,438,37	1,429.58	1,311.01	18-24 Jan	22-28 Feb	22-28 Mar	26 Apr-2 May	24-30 May	1,428.46	1,490.35	1,439,30	1,392.52	1,317.19	25-31 Jan		29 Mar-4 Apr		31 May-6 Jun	1,456.80		1,426,78		1,321.77	21-24 years	3 Jan	1-7 Feb	1-7 Mar	5-11 Apr	3-9 May	1,263.11	1,426.51	1,414,88	1,371,09	1,320.76	4-10 Jan	8-14 Feb	8-14 Mar	12-18 Apr	10-16 May	1,255.97	1,424.31	1,357,23	1,380.84	1,292.49	11-17 Jan	15-21 Feb	15-21 Mar	19-25 Apr	17-23 May	1,296.36	1,454.44	1,393,85	1,385.25	1,270.37	18-24 Jan	22-28 Feb	22-28 Mar	26 Apr-2 May	24-30 May	1,385.07	1,444.66	1,394,60	1,349.28	1,276.42	25-31 Jan		29 Mar-4 Apr		31 May-6 Jun	1,412.04		1,382,58		1,280.69	
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		Oil palm age	Price Jun (Rp)	Price Jul (Rp)	Price Aug (Rp)	Price Sep (Rp)	
		10-20 years	31 May-13 Jun	5-11 Jul	2-8 Aug	30 Aug-5 Sep	
			1,321.77	1,283.71	1,278.70	1,421.18	
			14-20 Jun	12-18 Jul	9-15 Aug	6-12 Sep	
			1,314.33	1,262.40	1,311.64	1,426.75	
			21-27 Jun	19-25 Jul	16-22 Aug	13-19 Sep	
			1,305.71	1,242.62	1,363.80	1,413.98	
			28 Jun-4 Jul	26 Jul-1 Aug	23-29 Aug	20-26 Sep	
			1,313.50	1,237.82	1,403.00	1,359.00	
		21-24 years	31 May-6 Jun	5-11 Jul	2-8 Aug	30 Aug-5 Sep	
			1,280.69	1,243.83	1,238.78	1,377.07	
			14-20 Jun	12-18 Jul	9-15 Aug	6-12 Sep	
			1,273.63	1,223.16	1,270.87	1,382.45	
			21-27 Jun	19-25 Jul	16-22 Aug	13-19 Sep	
			1,265.15	1,203.98	1,321.40	1,370.00	
			28 Jun-4 Jul	26 Jul-1 Aug	23-29 Aug	20-26 Sep	
			1,272.74	1,199.86	1,359.39	1,316.64	
6.10.2	<p>Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>FFB price for scheme smallholder determined by "Tim Penetapan Harga TBS Dinas Perkebunan Provinsi Jambi", released on weekly basis. FFB Price formula for Plasma is as follow:</p> <p>FFB Price = K Index [(CPOprice x OER) + (PKprice x KER)]</p> <p>The FFB price is divided based on planting ages (3, 4, 5, 6, 7, 8, 9 years, 10 – 20 years, 21, 22, 23, 24 and 25 years), the differences of prices from is OER and KER.</p> <p>FFB Pricing for third party is determined by market mechanism and set every day and recorded in the pricing of FFB Bungo Tebo Palm Oil Mill. FFB price establishment was documented by company</p>				Comply	

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	<p>under "Mekanisme Penerimaan TBS Luar (Agen/Pengepul)". FFB price from third parties is as follow :</p> $\{(CPO\ Price - Transport\ cost \times OER) = X\} + \{(PK\ price - Transport\ cost \times KER) = Y\} = A$ <p>Processing cost = B FFB Gross price = (A – B) = C Miscellaneous cost = D FFB price = C – D</p> <p>Price changes will be informed one day before the changes, and it was applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers and scheme smallholder. Based on interview with a number of FFB supplier, they can demonstrate their understanding.</p> <p>Scheme Smallholder:</p> <p>The practice in accordance to current applicable regulation "Peraturan Menteri Pertanian No.395 tahun 2005 pasal 5 ayat 2". The pricing mechanism takes into account average CPO price, CPO extraction rate, average PK price, PK extraction rate and "Indeks K" (explains proportion of FFB supplied by smallholder to the mill). The FFB price sets at different level – refer to palm age.</p> <p>Smallholder manager disseminated the FFB price to cooperative/KUD once the "Surat Berita Acara Hasil Rapat Penetapan Harga Pembelian TBS Kelapa Sawit Produksi Pekebun di Provinsi Jambi" being circulated by Provincial authority.</p> <p>Mechanism for FFB price establishment has been understood by smallholder. FFB price for scheme smallholder was established based on price sets by "Dinas Perkebunan Provinsi Jambi", released on weekly basis. FFB price was informed to smallholder farmer via short message and it was also made available in Cooperative offices and mill gate.</p> <p>As an alternative, smallholder can inquire through SMS the FFB pricing to Cooperative office or to PT. Rigunas Agri Utama.</p> <p>Sampled information verified: KUD Sawit Tanduk Perkasa inquiry on 17 October 2019 on FFB price, and informed by company assistant "Penetapan Harga TBS Provinsi Jambi periode 18-24 Oktober 2019 tanaman kelapa sawit usia 10-20 tahun Rp.1,365.71; tanaman kelapa sawit usia 21-24 tahun Rp.1,323.01" – based</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>on Jambi Province government, period 18-24 October 2019, oil palm aged 10-20 years Rp.1,365.71; and oil palm aged 21-24 years price Rp.1,323.01;</p> <p>KUD Sawit Makmur Bersama inquiry on 5 October 2019 on FFB price, and informed by company assistant "Penetapan Harga TBS Provinsi Jambi periode 4-10 Oktober 2019 tanaman kelapa sawit usia 10-20 tahun Rp.1,335.49; tanaman kelapa sawit usia 21-24 tahun Rp.1,293.75" – based on Jambi Province government, period 18-24 October 2019, oil palm aged 10-20 years Rp.1,335.49; and oil palm aged 21-24 years price Rp.1,293.75;</p>	
<p>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.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>FFB price determination and information of FFB price has been done in transparent manner and understood by FFB supplier. FFB price changes were carried out one day before effective implementation. FFB price for scheme smallholder was based on FFB price determined by "Dinas Perkebunan Provinsi Jambi". This was explained clearly in agreement/contract with PT Rigunas Agri Utama. FFB purchasing Jambi will provide information of FFB price via SMS and telephone call to suppliers. Evidence of SMS and information of FFB price changes can be demonstrated during interview with suppliers.</p> <p>Another sample on replanting activity, currently PT Rigunas Agri Utama carried out replanting activity incooperated with contractor. Work agreement No.009/P3KBT/01/19 dated 14 January 2019 between PT Rigunas Agri Utama and CV Selamat Mandiri Pratama (Replanting contractor) can be demonstrated and all parties has understood contractual agreement. Contract was signed by each party; contracts are fair, legal and transparent.</p> <p>Scheme Smallholder:</p> <p>KUD Sawit Sumay Makmur have contract agreement with FFB transporter "Surat Perjanjian Kerja Koperasi Unit Desa Sawit Sumay Makmur dengan Pengusaha Angkutan TBS Kelapa Sawit tentang Kerjasama Pengangkutan Tandan Buah Segar Kelapa Sawit dari Kebun Plasma Wilayah Kerja KUD Sawit Sumay Makmur ke PMKS PT. Rigunas Agri Utama No.15/SPK/KUD-SSM/TBS/I/2019" between KUD Sawit Sumay Makmur and Arianto. The contract covers payment rate: Rp.140/kg; payment schedule 1 week after smallholder paid by company; transport FFB within 48 hours after harvest; contractors shall comply with cooperative's policy related to anti-discrimination, equal opportunity, respecting rights for collective</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>bargain, prohibit use child worker, respect code of ethical conduct, implement health and safety policy including provision of PPE for worker, prohibit sexual harassment. The contract signed by both parties dated 15 January 2019. The contract remains valid until amendment.</p> <p>KUD Sawit Makmur Bersama have contract agreement with FFB transporter "Surat Perjanjian Kerja Koperasi Unit Desa Sawit Makmur Bersama dengan Pengusaha Angkutan TBS Kelapa Sawit tentang Kerjasama Pengangkutan Tandan Buah Segar Kelapa Sawit dari Kebun Plasma Wilayah Kerja KUD Sawit Makmur Bersama ke PMKS PT. Rigunas Agri Utama No.03/SPK/KUD-SMB/TBS/I/2019" between KUD Sawit Makmur Bersama and Dainuri. The contract covers payment rate: Rp.165/kg; payment schedule 1 week after smallholder paid by company; transport FFB within 48 hours after harvest; contractors shall comply with cooperative's policy related to anti-discrimination, equal opportunity, respecting rights for collective bargain, prohibit use child worker, respect code of ethical conduct, implement health and safety policy including provision of PPE for worker, prohibit sexual harassment.</p> <p>The contract signed by both parties dated 2 January 2019. The contract remains valid until amendment.</p>	
<p>6.10.4</p>	<p>Agreed payments shall be made in a timely manner. - Minor compliance -</p> <p>Bungo Tebo POM and Estate:</p> <p>The company has established FFB payment system. FFB paid based on nettweight stated on weighbridge ticket. A copy of weighbridge ticket received by Jambi Regional Office, then payment made by transferring money to supplier's bank account.</p> <p>Payment FFB conducted after Bungo Tebo POM submit the weighbridge data of FFB from third party supplier and Purchasing department transfer the payment based on weighbridge data received. Payment record can be demonstrated during audit and made in a timely manner, for example payment record on 18 October 2019 G/L account 110000084*** for CV Asri Bersaudara (91,235 kg), G/L account 110000084*** for UD Royal (50,275 k). From the payment record can be demonstrated that the payment value is in accordance with price agreed by both party.</p> <p>Payment for replanting activity by CV Selamat Mandiri Pratama can be demonstrated during audit. Replanting payment carried out after contractor finishing their job which recorded in "Berita Acara Hasil Kerja Kontraktor". For example dated 31 August 2019 according to SPK No. 131-A/KBT/06/19, 131-A/KBT/07/19, 131-A/KBT/08/19, BA Hasil Kerja for activity Tumbang, chipping, dig holes with number of</p>	<p>Comply</p>

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		<p>hole planting 87,283 holes. Payment record can be demonstrated and in accordance with agreed price based on Agreement Letter.</p> <p>Scheme Smallholder:</p> <p>Evidence of payment from KUD Sawit Sumay Makmur to FFB transporter (Arianto). Kartu Timbangan No.PBTA219108506, dated 1 August 2019, nett FFB 6,363 kg. Sighted payment receipt from KUD Sawit Sumay Makmur to Arianto, dated 1 September 2019 of Rp.890,820 (rate Rp.140/kg) from transport of 6,363 kg FFB.</p> <p>Evidence of payment from KUD Sawit Makmur Bersama to FFB transporter (Dainuri). Kartu Timbangan No.PBTA21910645506, dated 23 September 2019, nett FFB 6,948 kg. Sighted payment receipt from KUD Sawit Makmur to Dainuri, dated 1 October 2019 of Rp.1,416,420 (rate Rp.165/kg) from transport of 6,948 kg FFB.</p> <p>Payment of FFB to the smallholder made ontime – every month.</p> <p>KUD Sawit Sumay Makmur, Hamparan 03, smallholder No.278, harvesting period 13-19 September 2019, harvesting of 2.069 tons. FFB price rate Rp.1,370/kg at 13-19 September 2019. Payment received Rp.2,834,530.</p> <p>KUD Sawit Makmur Bersama, Hamparan 79, smallholder No.1529: harvesting period 13-19 September 2019, harvesting of 1.960 tons. FFB price rate Rp.1,370/kg at 13-19 September 2019. Payment received Rp.2,685,200.; harvesting period 6-12 September 2019, harvesting of 1.603 tons. FFB price rate Rp.1,382.45/kg at 6-12 September 2019. Payment received Rp.2,216,067.</p>	
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>			
6.11.1	<p>Records of contributions to local development based on the results of consultation with local communities shall be available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Records of contributions to local development based on the results of consultation with local communities available under "Laporan Pelaksanaan CSR periode Januari – Desember 2019".</p> <p>Based on interview with official representative in (BDP in Kandang Village and Head of Punt Kalo Village) stated that in preparing of CSR program, the company has taking into consideration suggestion</p>	Comply

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	<p>and request from communities, survey result, data capture and verification upon project proposals – as well as budget for the program.</p> <p>A number of stages that has been carried out:</p> <ul style="list-style-type: none"> – Evaluation on CSR program year 2018; – Identification on CSR program requirement year 2019; – Verification on villages requirement on CSR year 2019; – Selection on program proposal for CSR program 2019; – Budget preparation for CSR 2019; <p>Report of implementation the program CSR year 2019 (January – July 2018) also available and able to demonstrated.</p> <ul style="list-style-type: none"> • Eid Peket Aid for Dhuafa in May 2019 in Pinang Balia Village, Sekutur Jaya, Napal Putih, Bukit Pamuatan, Sako Makmur, Tuo Sumay Teriti, Tambun Arang, Jetik Belarik and Teluk Singkawang Village. • MTQ Fund Assistance in the villages of Teluk Singkawang, Teriti Tuo Sumay and Bukit Pamuatan in October 2019 • Donation for Tebo Regency's birthday in Bukit Harapan Village in October 2019 • Aid for traditional Kompangan art tools in Teluk Singkawang Village, Sumay District in May 2019 • Aid for 10 goats for the poor in the villages of Tuo Sumay and Teriti in September 2019 • Assistance with the construction of RKB (Joint Classrooms) in MAN (Madrasah Aliyah Negeri) in Rambah Village in May 2019 • Free medical treatment in the villages of Teriti and Tuo Sumay on Bualn Septemebr 2019 • Construction of bore wells for clean water in the villages of Tuo Sumay and Ulu Gedong in May 2019. <p>The results of a field visit to Tuo Sumay Village and an interview with the Head of Tuo Sumay Village revealed that in 2019 the company PT Rigunas Agri Utama had assisted in the construction of a Posyandu to improve the quality of public health.</p>	

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	<p>Scheme smallholders:</p> <p>Cooperative has actively contributed to village development available in document of “Kegiatan Sosial KOPERASI year 2019”, such as:</p> <ul style="list-style-type: none"> • In Koperasi Sawit Keluarga Sejahtera: Date 5 February 2019, assistance fund for PKK Bungo Tanjung Village as Rp 500,000 • In Koperasi Sawit Keluarga Sejahtera: Date 5 February 2019, assistance fund for contribution on Indonesian Independent day party (Rp 500,000) • In Koperasi Sawit Tanduk Perkasa, dated 28 May 2019 provide fund assistance for “Safari Ramadhan” in Masjid/masque Desa Makmur of Rp 500,000 • In Koperasi Sawit Makmur Bersama, dated 21 April 2019 provide fund assistance for “Isro Miraj 1440 H” in masque Desa Bukit Pamuatan of Rp 500,000 • In Koperasi Barokah, dated 15 August 2019 provide fund assistance for “peringatan Idul Adha” in masque Desa Rambahan of Rp 500,000 • In Koperasi Sawit Sumay Makmur, dated 10 June 2019 provide fund assistance for “peringatan Idul Fitri” in masque Desa Pinang Balai of Rp 500,000 <p>Based on interview with management of KOPERASI -> village fee of Rp. 2/kg FFB being sold. The fee then managed to support education, religious festival and other activity.</p> <p>On monthly basis, cooperatives made contribution to the village – deducted with percentage from each kg FFB sold.</p> <table border="1" data-bbox="667 1109 1624 1380"> <thead> <tr> <th></th> <th>KUD Barokah</th> <th>KUD Sawit Tanduk Perkasa</th> <th>KUD Sawit Makmur Bersama</th> <th>KUD Sawit Sumay Makmur</th> <th>KUD Sawit Keluarga Sejahtera</th> </tr> </thead> <tbody> <tr> <td>Rate</td> <td>Rp.3/kg</td> <td>Rp.1/kg</td> <td>Rp.1/kg</td> <td>Rp.3/kg</td> <td>Rp.1/kg</td> </tr> <tr> <td>Jan 2019</td> <td>1,077,951</td> <td>1,090,928</td> <td>889,711</td> <td>2,892,870</td> <td>178,000</td> </tr> <tr> <td>Feb 2019</td> <td>674,314</td> <td>920,545</td> <td>795,449</td> <td>2,414,523</td> <td>144,597</td> </tr> <tr> <td>Mar 2019</td> <td>983,403</td> <td>1,227,588</td> <td>802,577</td> <td>2,561,139</td> <td>171,696</td> </tr> <tr> <td>Apr 2019</td> <td>681,183</td> <td>1,282,411</td> <td>1,000,073</td> <td>2,310,669</td> <td>181,256</td> </tr> <tr> <td>May 2019</td> <td>1,285,305</td> <td>1,538,578</td> <td>1,103,500</td> <td>3,332,625</td> <td>254,893</td> </tr> </tbody> </table>		KUD Barokah	KUD Sawit Tanduk Perkasa	KUD Sawit Makmur Bersama	KUD Sawit Sumay Makmur	KUD Sawit Keluarga Sejahtera	Rate	Rp.3/kg	Rp.1/kg	Rp.1/kg	Rp.3/kg	Rp.1/kg	Jan 2019	1,077,951	1,090,928	889,711	2,892,870	178,000	Feb 2019	674,314	920,545	795,449	2,414,523	144,597	Mar 2019	983,403	1,227,588	802,577	2,561,139	171,696	Apr 2019	681,183	1,282,411	1,000,073	2,310,669	181,256	May 2019	1,285,305	1,538,578	1,103,500	3,332,625	254,893	
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Jan 2019	1,077,951	1,090,928	889,711	2,892,870	178,000																																							
Feb 2019	674,314	920,545	795,449	2,414,523	144,597																																							
Mar 2019	983,403	1,227,588	802,577	2,561,139	171,696																																							
Apr 2019	681,183	1,282,411	1,000,073	2,310,669	181,256																																							
May 2019	1,285,305	1,538,578	1,103,500	3,332,625	254,893																																							

Criterion / Indicator		Assessment Findings						Compliance
		Jun 2019	949,560	1,694,690	1,202,714	3,512,685	235,089	
		Jul 2019	843,909	1,683,254	1,207,652	4,119,852	255,543	
		Aug 2019	777,534	1,632,556	1,232,976	3,240,645	259,419	
		Sep 2019	1,985,073	1,226,425	880,919	4,059,018	139,990	
		<p>Cooperatives have actively contributed to village development available in document of "Aktivitas Sosial Koperasi Unit Desa". Sampled and verified data:</p> <ul style="list-style-type: none"> - Koperasi Unit Desa Sawit Keluarga Sejahtera made contribution of Rp. 500,000 to women organization in Desa Bungo Tanjung, dated 5 February 2019; Koperasi Unit Desa Sawit Keluarga Sejahtera made contribution of Rp. 500,000 for Independence Day in Desa Bungo Tanjung, dated 17 August 2019; - Koperasi Unit Desa Sawit Tanduk Perkasa made contribution of Rp. 1,250,000 for Masjid on Eid al Fitr and Quran citation competition dated 13 June 2019; Koperasi Unit Desa Sawit Tanduk Perkasa made contribution of Rp. 600,000 for Football competition in Desa Sako Makmur, dated 18 August 2019; - Koperasi Unit Desa Barokah made contribution of Rp. 1,200,000 for Ramadhan activities in Desa Teluk Kasai Rambahan, dated 3 and 14 June 2019; - Koperasi Unit Desa Sawit Makmur Bersama made contribution of Rp. 500,000 for Primary School SD Bukit Pamuan, dated 22 April 2019; 						
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme smallholders:</p> <p>PT. Rigunas Agri Utama was a oil palm plantation company that was developed to support government program PIR-Trans.</p> <p>In ASA-4 year 2019, the realisation of scheme smallholder plantation was 5,914 Ha consisted of 18 cooperatives/KOPERASI and 124 farmer group and more than 2957 farmers smallholders.</p> <p>PT. Rigunas Agri Utama has a staff that responsible to managed scheme smallholder plantation. A plasma coordinator heads of a estate manager, head assisstant and 4 assistants. 9 staff members and 43 non-staff.</p> <p>A form of cooperation is PIR-Trans with full managed by smallholders. Company established a management for scheme smallholder with roles of training, counseling and maintain scheme smallholder.</p>						<p>Not applicable N/A</p>

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	<p>Oil palm plantation upkeep and harvesting activities performed by smallholders and supervised by company. Standard upkeep and treatment of plants and harvesting in accordance with best practice agronomic also applied by smallholders and supervised by company. Fertilizer recommendation for scheme smallholder, including fertilizer order was managed and prepared by PT. Rigunas Agri Utama – as nucleus estate.</p> <p>Training program for scheme smallholder was no different from PT. Rigunas’s training module for staff. Training to improved productivity, e.g:</p> <ul style="list-style-type: none"> • Koperasi Barokah – Training on harvesting conducted on 11 January 2019, was attended 12 smallholders members. • Koperasi Barokah – Training on Pengendalian Gulma conducted on 15 May 2019, was attended 32 smallholders members. • Koperasi Barokah – Training on Basic Fire conducted on 11 April 2019 2019, was attended 22 smallholders members. • Koperasi Sawit Sumay Makmur – Training on harvesting conducted on 10 January 2019, was attended 13 smallholders members. • Koperasi Sawit Sumay Makmur– Training of Kesehatan dan Keselamatan Kerja conducted on 14 February 2019, was attended 24 smallholders members. <p>PT. Rigunas Agri Utama was a oil palm plantation company that was developed to support government program PIR-Trans.</p> <p>PT. Rigunas Agri Utama has a staff which responsible to managed scheme smallholder plantation. A plasma coordinator heads of a estate manager, head assisstant and 4 assistants. 9 staff members and 43 non-staff.</p> <p>A form of cooperation is PIR-Trans with full managed by smallholders. Company established a management for scheme smallholder with roles of training, counseling and maintain scheme smallholder.</p> <p>Oil palm plantation upkeep and harvesting activities performed by smallholders and supervised by company. Standard upkeep and treatment of plants and harvesting in accordance with best practice agronomic also applied by smallholders and supervised by company. Fertilizer recommendation for scheme smallholder, including fertilizer order was managed and prepared by PT. Rigunas Agri Utama – as nucleus</p>	

Criterion / Indicator	Assessment Findings	Compliance
	estate. Training for smallholder as in indicator 4.8	
Criterion 6.12: No forms of forced or trafficked labour are used.		
6.12.1 There shall be evidence that no forms of forced or trafficked labor are used. - Major compliance -	<p>Bungo Tebo POM and Estate:</p> <p>Policy related forced or trafficked labour has been established in the company policy dated 1st December 2014. There are no foreign workers in Tebo Estate and Bungo Tebo Palm Oil Mill, based on evidences which has been reviewed such as "Daftar Karyawan Rigunas Agri Utama year 2019" updated September 2019, employee contract of PHL.</p> <p>Based on interview with labour union stated there were no forced labour hired by company/cooperative and/or scheme smallholder farmer. All work relation was made on mutual agreement. Work relation was based on mutual agreement. Interview with labour union</p> <p>Recruitment process was documented in Procedure: AA-HR-305.2-R0 dated 1st February 2009 – Recruitment and Selection stated that Staff recruitment conduct by Head Office in Jakarta. For workers in site, recruitment processes conduct by Site Management with approval from company management.</p> <p>Permanent worker based on "Perjanjian Kerja bersama (PKB) 2018 – 2020" agreed by company and worker union; acknowledge by Manpower Ministry dated 8 April 2019, validity 2 years.</p> <p>Scheme Smallholders:</p> <p>All work relation performed in scheme smallholder plantation was made on mutual agreement. Work relation was based on mutual agreement. Interview with harvester on smallholder in KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani confirmed they work based on agreement between block owners and the harvester.</p> <p>PT Rigunas Agri Utama - Bungo Tebo has issued the Company Policy on 9 November 2018 signed by HRD Region Plantation Manager 3 Jambi regarding forced labor and human trafficking. The definition of forced labor as defined in the policy is the work carried out under the threat of punitive sanctions</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>where workers do not have the freedom to agree on the implementation of the work. The policy states that PT Rigunas Agri Utama - Bungo Tebo prohibits any form of forced labor and human trafficking in every operational activity of the company in accordance with applicable national and international regulatory requirements in the following ways:</p> <p>The policy states that PT Rigunas Agri Utama - Bungo Tebo Plantation and Plant prohibits any form of forced labor and human trafficking in every operational activity of the company in accordance with applicable national and international regulatory requirements in the following ways:</p> <ul style="list-style-type: none"> - Guaranteeing employees who will and are working in the company is not the result of human trafficking through a standardized employee recruitment system. - Communicating this policy to every staff, foreman, employee, supplier, contractor at all levels and functions of organizations and cooperatives that are guided by the company to care about this company policy and encourage them to be responsible for compliance. <p>The policy has been communicated to all employees. Examples of socialization through muster morning on Afdeling 3 and Traksi on 14 November 2018. During interview with workers, they have aware and understand the company policy concerning on forced labor and human trafficking.</p>	
<p>6.12.2</p> <p>It shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Based on observation of several employee contract and interview with employee could be demonstrated that there was no contract substitution occurred.</p> <p>There is no migrant worker in PT. Rigunas Agri Utama – Tebo Estate. It’s verified during audit documentation list of employee and interview with employee.</p> <p>Employees work based on contract labour agreement which contains agreements include: working time, dependents, payroll and consent of both parties. Workers was given a copy of their employment contracts and the contract was identical to the one signed at the time of recruitment.</p> <p>Evident seen:</p> <p>List of Employees PT Rigunas Agri Utama, updated in September 2019</p> <ul style="list-style-type: none"> - Work Agreement for Daily Worker nomor 270/KBT/RAU/SPKHL/II/01/2019, namely Mr Susanto Bin Ripai (PHL – Upkeep) valid until 31st December 2019. 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Work Agreement for Daily Worker nomor 13927/KBT/RAU/SPKHL/II/01/2019, namely Mr Adi Saputra (PHL – Upkeep) valid until 31st December 2019. - Work Agreement for Daily Worker nomor 088/KBT/RAU/SPKHL/II/01/2019, namely Mr Adi Putra Sinaga (PHL – Upkeep) valid until 31st December 2019. <p>Scheme smallholders:</p> <p>No migrant worker. All worker was working under work agreement.</p> <p>Work agreement between cooperative and staff available in “Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI”, s.g:</p> <ul style="list-style-type: none"> - KOPERASI Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SPK/KUD-SSM/IV/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Sumay Makmur, namely Damanhuri (Sekertaris KOPERASI Sawit Sumay Makmur), dated 1 April 2019. - KOPERASI Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SK/KUD-BRKH/I/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI BAROKAH, namely Rahmat (Bendahara KOPERASI Sawit Sumay Makmur), dated 1 January 2019. - KOPERASI Sawit Keluarga Sejahtera – Surat Perjanjian Kerja No 03/SK/KUD-SKS/II/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Keluarga Sejahtera, namely Khamsiyah (Bendahara KOPERASI Sawit Keluarga Sejahtera), dated 1 January 2019. - KOPERASI Sawit Tanduk Perkasa – Surat Perjanjian Kerja No 016/SK/KUD-STP/IV/2018 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Tanduk Perkasa, namely Yadi Efendi (Bendahara KOPERASI Sawit Tanduk Perkasa), dated 1 April 2019. <p>Inside the work contract covers: employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Contract was made available in Bahasa Indonesia and understood by both parties.</p> <p>Smallholder farmer was using temporary workers with piece rate payment. The agreement was not written. The work performed such as harvesting activity, pruning, and raking woodies.</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>Inside the work contract, covers: employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Contract was made available in Bahasa Indonesia and understood by both parties.</p> <p>Smallholder farmer was using temporary workers with piece rate payment. The agreement was not written. The work performed such as harvesting activity, pruning, and raking woodies.</p>	
6.12.3	<p>Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme smallholders:</p> <p>Based on interview with management team of PT Rigunas Agri Utama and Smallholder Cooperative have informed that there were no migrant workers employed by company. Company has a policy with regards to worker's right equality and non-discrimination to worker including if there is worker from different nationality.</p> <p>No migrant worker employed by cooperative or smallholder farmer. All worker was working under work agreement.</p>	Comply
<p>Criterion 6.13: Growers and millers respect human rights.</p>			
6.13.1	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>Company has established a policy related to respecting human rights as documented under "Kebijakan Perusahaan Asian Agri" dated 1st December 2014. Chapter 13 stated "Perusahaan menghormati hak asasi manusia dengan memperlakukan seluruh karyawan secara adil baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur" – company respects human rights and treated all employees in equal manner, during recruitment, assessment, condition and work environment, and representation – without discrimination on tribe, caste, gender, sexual orientation, worker union, politic affiliation, and/or age.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p>	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>List of attendance on refresh the socialization of Company Policy “Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> - On 7 May 2019 location in Division IV was attended by 11 workers - On 9 July 2019 location in Division II was attended by 25 workers - On 23 July 2019 location in Division III was attended by 17 workers - On 7 August 2019 location in Division I was attended by 25 workers <p>The appointed person in charge is managers and assisstants, to communicating the policy internally. The policy have been communicated to all level of workers, verbally and through posters. While public relation officer was appointed to communicating the policy externally. Until now, there was no outstanding case regaring human rights violation.</p> <p>Scheme smallholders:</p> <p>Cooperative has defined their policy for a policy to respect human rights in “Kebijakan Koperasi” issued 2nd January 2017, in point 9 mentioned that “Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KOPERASI maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi polik dan/atau umur”</p> <ul style="list-style-type: none"> - In Koperasi Sawit Tanduk Perkasa has conducted on 8th March 2019, was attended by 17 members of smallholder. - In Koperasi Sawit Keluarga Sejahtera has conducted on 8th March 2019 was attended by 12 smallholders member. - In KOPERASI Barokah has conducted on 7th January 2019 was attended by 27 smallholders member - In KOPERASI Sawit Makmur Bersama has conducted on 8 January 2019 was attended by 18 smallholders member and on 7 January 2019 was attended by 20 smallholders member - In KOPERASI Sawit Sumay Makmur has conducted on 8 January 2019 was attended by 23 smallholders member. 	

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Criterion / Indicator	Assessment Findings	Compliance	
Principle 7: Responsible development of new plantings			
Criterion 7.1: A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.			
7.1.1	An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented. - Major compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A

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Criterion / Indicator	Assessment Findings	Compliance	
<p>Criterion 7.2: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
<p>7.2.1</p>	<p>Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. - Major compliance -</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	<p>Not Applicable N/A</p>
<p>7.2.2</p>	<p>Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. - Minor compliance -</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	<p>Not Applicable N/A</p>
<p>Criterion 7.3: New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</p>			
<p>7.3.1</p>	<p>There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p>	<p>Not Applicable N/A</p>

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	<p>planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p>- Major compliance –</p>	<p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	
7.3.2	<p>Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting.</p> <p>- Major compliance –</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	<p>Not Applicable N/A</p>
7.3.3	<p>Records of land preparation and clearing dates shall be available.</p> <p>- Minor compliance –</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	<p>Not Applicable N/A</p>
7.3.4	<p>An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower’s</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p>	<p>Not Applicable N/A</p>

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Criterion / Indicator		Assessment Findings	Compliance
	relevant operational procedures. (see Criterion 5.2) - Major compliance –	Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2). - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
Criterion 7.4: Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.			
7.4.1	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed,	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil	Not Applicable N/A

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Criterion / Indicator		Assessment Findings	Compliance
	plans shall be developed and implemented to protect them without incurring adverse impacts. - Major compliance -	palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
Criterion 7.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
7.5.1	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. - Major compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
Criterion 7.6: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.			

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Criterion / Indicator		Assessment Findings	Compliance
7.6.1	Documented identification and assessment of demonstrable legal, customary and user rights shall be available. - Major compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.6.2	A system for identifying people entitled to compensation shall be in place. - Major compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. - Major compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.	Not Applicable N/A

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Criterion / Indicator		Assessment Findings	Compliance
		Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
7.6.6	Evidence shall be available that the affected communities and rights holders have access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not Applicable N/A
Criterion 7.7:			
No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.			
7.7.1	There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.	Not applicable N/A

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Criterion / Indicator		Assessment Findings	Compliance
	ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.7.2	In exceptional cases where fire has to be used for preparing land for planting, 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 -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not applicable N/A
Criterion 7.8: New plantation developments are designed to minimise net greenhouse gas emissions.			
7.8.1	The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. - Major compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1. Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	Not applicable N/A
7.8.2	There shall be a plan to minimise net GHG emissions	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification,	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	<p>which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p> <p>- Minor compliance -</p>	<p>field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	N/A
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1:			
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	<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"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); 	<p>A continuous improvement plan has been prepared and internal audit conducted to identify compliance to the RSPO P&C. Internal audit has been conducted to monitor implementation of RSPO P&C, based on consideration of social and environment impact, good agriculture practice for estate, best manufacturing practice for mill and OHS aspect.</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM and Estate have performed continual improvements to optimizing the yield or FFB production, reduction in certain use of chemicals, environmental impact, waste reduction, pollution and greenhouse gas emission and social impact. The action plan are monitored and documented, e.g:</p> <ul style="list-style-type: none"> – Bungo Tebo Estate has modified temporary of hazardous waste storage – Bungo Tebo POM has decreased power consumption at kernel station. – Bungo Tebo POM has minimized FFB loses, by: <ul style="list-style-type: none"> • Minimizing FFB unloading on the floor • Ensure the pressure at sterilizing process is 3 • Ensure that bunch press is operated effectively • Developing visual control or monitoring of oil loses at the station. – Bungo Tebo POM has decreased FFA, by: 	Comply

Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p>	<ul style="list-style-type: none"> • Minimizing FFB unloading on the floor • Emptying FFB from the conveyor after splitter at the end of process. • Drain condensate water after stop press. <p>PT Rigunas Agri Utama has established policy on commitment to eliminate paraquat (gramaxone – contact herbicide) based on electronic mail from Top Management dated 20 August 2019, that stated: not allowed to application the paraquat since end of September 2019.</p> <p>Scheme Smallholders: Continuous improvement plant at Plasma Bungo Tebo are as follows: Problem:</p> <ol style="list-style-type: none"> 1. Pesticide uses; 2. Optimum energy uses; 3. Occupational Health and Safety. <p>Program:</p> <ol style="list-style-type: none"> 1. Spraying activity based on recommendation from Smallholder management; established spraying program effectively and efficiently; spraying activity performed in same time in each Koperasi. 2. Determined limit for FFB loading at maximum 6 ton; dissemination of electricity uses in housing compound; record of diesel uses each month. 3. Discipline in PPE uses. 	

Appendix B: Approved Time Bound Plan

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015 <i>*Split From Buatan Estate Since 1 January 2019</i>
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016 <i>*Split From Ukui & Soga Estate Since 1 January 2019</i>
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau		
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi		
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi		Certified on 28 August 2012 Re-Certification on August 2017

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Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015
Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 <i>*Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019</i>
Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2020
		Penarikan & Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2020
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera		
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera		Certified on 6 March 2015
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera		Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2020	HGU is still in Process
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 7 January 2015

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		Peranap (Plasma)	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 18 August 2016
Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015
		Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Sentral, Aek Tarum & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		<ul style="list-style-type: none"> - Certified on 23 December 2016 as Independent Mill - Audit in 2016 as Mill and Supply Base HGU Complete Audit at ASA 3 (2018)
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra		
		Aek Kuo (501 Ha)			
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3 rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		<ul style="list-style-type: none"> - Certified on 8 April 2015 - Audit in 2016 as Independent Mill

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for PT Rigunas Agri Utama – Bungo Tebo POM and supply bases 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 PT Rigunas Agri Utama – Bungo Tebo POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.62
PK	0.62

Extraction	%
OER	20.89
KER	5.46

Production	t/yr
FFB Process	274,335
CPO Produced	56,948
PK Produced	14,971

Land Use	Ha
OP Planted Area	8,388.96
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	69.63
Total	8,458.59

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	24958.24	0.71	57896.4	0.52	0	0		
CO ₂ Emission from fertilizer	745.05	0.02	4586.74	0.04	0	0		
NO ₂ Emmision	2207.53	0.06	2956.41	0.03	0	0		
Fuel Consumption	1039.27	0.03	1066.09	0.01	0	0		
Peat Oxidation	0	0	0	0	0	0		
Sink								
Crop Sequestration	-23657.1	-0.68	-54878.11	-0.49	0	0		
Conservation Sequestration	0	0	0	0	0	0		

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Total	5292.99	2.09	0.15	11627.53	0.1			
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	52995.19	0.19
Fuel Consumption	506.59	0
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-619.36	0
Sales of PKS	-37958.8	-0.14
Sales of EFB	0	0
Total	14923.61	0.05

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	9300.5
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	9300.5

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (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.	The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill. Bungo Tebo Mill physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Bungo Tebo Mill also process non-certified FFB into non-certified CPO and PK, therefore the applicable RSPO SCC model is Module E - CPO Mills: Mass Balance. No change in the supply chain module since last assessment until audit ASA4.	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.	PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill is not a trader or distributors. The site physically handle and process Fresh Fruit Bunch (FFB) into CPO and PK. This clause is not applicable for the certification unit.	N/A
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.	PT Rigunas Agri Utama is a subsidiary of PT Inti Indosawit Subur, which is a member of RSPO with membership number 1-0022-06-000-00, since 6 February 2006. PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000002913.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill does not include any processing aid into organization’s scope of certification.	N/A

5.2 Supply chain model			
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.	Bungo Tebo Palm Oil Mill is certified against RSPO P&C 2013 with Supply Chain model Mass Balance. Therefore the site can process FFB from certified and non-certified sources. Bungo Tebo POM received certified raw material (Fresh Fruit Bunch) from its own estate (Bungo Tebo Estate) and from the Scheme Smallholder (Kebun Plasma Bungo Tebo). The certification of Bungo Tebo Estate and Plasma are fall under PT Rigunas Agri Utama – Bungo Tebo POM with certificate number RSPO 620917, start on 3 December 2015 and expired on 2 December 2020 The non-certified FFB are coming from individual farmer or FFB collector. Management of PT Rigunas Agri Utama - Bungo Tebo POM aware that they can only claim their product (CPO and PK) as Mass Balance (MB).	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	PT Rigunas Agri Utama - Bungo Tebo POM uses Mass Balance as their RSPO Supply Chain Certification model, therefore the site can only claim its product as Mass Balance (MB).	Yes
5.3. Documented Procedures			
5.3.1	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: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	During this 4 th Annual Surveillance Assessment (ASA4) PT Rigunas Agri Utama - Bungo Tebo POM can demonstrates: <ol style="list-style-type: none"> 1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Bungo Tebo Estate and Bungo Tebo Plasma, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. 2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each 	Yes

		<p>year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <p>3. SOP of Palm Oil Mill operation:</p> <ul style="list-style-type: none"> a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer) c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation) d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station) e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification) f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation) g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station) h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment) m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch) 	
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		- SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair)	
	<ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records (see Clause 5.8 – Training).	Yes
	<ul style="list-style-type: none"> 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. 	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit 2 times in a year, to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	The site has effectively implements and maintains the standard requirement by performing internal audit. Latest RSPO SCC Internal audit in Bungo Tebo POM carried out on 1 – 4 October 2019 by internal auditor Mr. Hendyk K.S, Ridho Ilahi, Ian Septian Arifin against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance. Audit results two nonconformities, findings can be demonstrated and the corrective action has been implemented to address issue found during audit. Other RSPO internal audit at Bungo Tebo POM has been performed integrated with RSPO SCCS, resulting 11 non conformities. Corrective action plan has been determined and implemented.	Yes

5.4. Purchasing and goods in		
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"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>PT Rigunas Agri Utama - Bungo Tebo POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS" (FFB Delivery Note), covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT Rigunas Agri Utama - Bungo Tebo POM receive FFB from certified and non-certified source. Certified source consist of own estate, Bungo Tebo Estate and Scheme Smallholder (Kebun Bungo Tebo Plasma). Non-certified FFB sourced from third party supplier, consist of individual farmers and/or FFB collectors, e.g.: PD Asan Jaya, Pandawa 58, CV Asri Bersaudara, SDR, Koperasi Sawit Makmur, UD Royal, KOPERASI Sawit Tanduk Perkasa.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 007409, dated 14/10/2019, Vehicle Number: BK 8978 CR, loading worker: Jamur & Juwito, source: PT RAU – Bungo Tebo Estate, Division IV Block D08L, FFB amount: 290 bunch. - Weighbridge Ticket No. PBTA119203737 dated 14/10/2019, commodity: FFB Certified; source: Bungo Tebo Estate-Afdeling IV Block D08L, amount: 290 bunch, Netto: 6,050 kg, RSPO Cert: RSPO620917, transporter: internal, vehicle number: BK 8978 CR, driver: Tamrin, batch number: 13-100-71392019-41080392. - Surat Pengantar TBS No. 006070, dated 14/10/2019, Vehicle Number: BH 8124 MF, loading worker: Dtk, Shi, source: PT RAU – Bungo Tebo Estate, Division I Block A16G, FFB amount: 985 bunch.

Yes

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		<ul style="list-style-type: none"> - Weighbridge Ticket No. PBTA119203736 dated 14/10/2019, commodity: FFB Certified; source: Bungo Tebo Estate-Afdeling I Block A16G, amount: 985 bunch, Netto: 6,000 kg, RSPO Cert: RSPO620917, transporter: internal, vehicle number: BH 8124 MF, driver: Rama Dani, batch number: 13-100-71392019-41080361. - Surat Pengantar TBS No. D00979, dated 15/10/2019, Vehicle Number: BH 9012 WU, driver: Nainggolan, source: Kelompok Tani 104 Jati Jaya Desa Jati Belarik (KUD Belarik Jaya), Kavling: 3, 1, 8, 5, FFB amount: 125 bunch. - Weighbridge Ticket No. PBTA119111570 dated 14/10/2019, commodity: FFB Certified; source: KT-104 Jati Indah, amount: 125 bunch, Block: P5104, Netto: 2,444 kg, RSPO Cert: RSPO620917, transporter: Plasma, vehicle number: BH 9012 WU, driver: Nainggolan, batch number: 13-100-34342018-41080904. - Surat Pengantar TBS No. D00086, dated 15/10/2019, Vehicle Number: BH 9907 EU, driver: Bima, source: Kelompok Tani 2 Sawit Indah Makmur Desa Pinang Belai (KUD Sawit Sumay Makmur), Kavling: 328, 329, 330, 331, FFB amount: 265 bunch. - Weighbridge Ticket No. PBTA119111569 dated 15/10/2019, commodity: FFB Certified; source: KT-002 Sawit Indah Makmur, amount: 265 bunch, Block: P1002, Netto: 5,346 kg, RSPO Cert: RSPO620917, transporter: Plasma, vehicle number: BH 9907 EU, driver: Bima, batch number: 13-100-34342018-41080901. <p>Non Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 076, dated 15/10/2019, Vehicle Number: BH 8425 WM, driver: Kancil, source: Supplier SDR, ID: ST00063, FFB amount: 70 bunch. - Weighbridge Ticket No. PBTA1191116725 dated 15/10/2019, commodity: FFB Certified; source: Supplier SDR, amount: 70 bunch, 	
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		<p>Netto: 1,302 kg, transporter: Umum/General, vehicle number: BH 8425 WM, driver: Kancil.</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 075, dated 15/10/2019, Vehicle Number: BH 8340 WU, driver: Tedi, source: Supplier SDR, ID: ST00063, FFB amount: 70 bunch. - Weighbridge Ticket No. PBTA1191116725 dated 15/10/2019, commodity: FFB Certified; source: Supplier CV Asri Bersaudara, amount: 250 bunch, Netto: 6,374 kg, transporter: Umum/General, vehicle number: BH 8340 WU, driver: Tedi. 	
	<ul style="list-style-type: none"> • 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). 	<p>Informations are complete and presented in several document, e.g. Surat Pengantar TBS and Weighbridge Ticket. Report of FFB receiving are documented in Laporan Harian Pabrik (Mill Daily Report), Laporan Unit Kebun (Monthly Mill Report) and Mill Summary Report.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • 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. 	<p>PT Rigunas Agri Utama - Bungo Tebo Mill has ensured that certified FFB received are RSPO certified based on the source of FFB. Based on interview with weighbridge clerk and FFB receiving station, the Mill only received certified FFB from own estate (Bungo Tebo Estate) and Scheme Smallholder (Plasma Bungo Tebo) which have been certified as supply bases of Bungo Tebo POM. Other than that are non-certified FFB.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • 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 (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	<p>The site does not need to check the certificate validity of the FFB source, because the certification of the FFB suppliers is fall under PT Rigunas Agri Utama - Bungo Tebo POM.</p>	<p>N/A</p>

	<ul style="list-style-type: none"> 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. 	The site has never purchased or sales any certified palm oil product from traders or distributors.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	In the case on non-conforming raw material entering the process, PT Rigunas Agri Utama - Bungo Tebo POM has the mechanism to handle nonconforming material and/or document. PT Rigunas Agri Utama – Bungo Tebo POM demonstrated the simulation on recall of non-conforming material. Until this 4 th annual surveillance assessment, there has been no case of non-conforming material entering the process.	Yes
5.5. Outsourcing activities			
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 independement 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>The transport for RSPO certified sustainable CPO delivery was carried out by CV Teman Setia, whilst PK was directly transfer to KCP Bungo Tebo which is integrated with Bungo Tebo POM. The transporter was appointed, contracted and instructed by Marketing Asian Agri Medan. Mostly CPO certified is delivered to PT Sari Dumai Sejati (Bulking Station). PT Sari Dumai Sejati is a sister company of PT Rigunas Agri Utama – Bungo Tebo POM and has been certified RSPO SCCS by Control Union, Certificate No. CU-RSPO SCC-821960 dated 30 August 2017 valid until 29 August 2022. whilst PT Rigunas Agri Utama – Bungo Tebo KCP hold RSPO SCC certificate RSPO 661647 issued by BSI.</p> <p>PT Rigunas Agri Utama control the CPO and PK transporter by “Surat Perintah Kerja (SPK)” and “Daftar Periksa Kesiapan Kerja Pengiriman”.</p> <p>SPK covered information as explain in indicator 5.5.2 b. while “Daftar Periksa Kerja” is the tool to control the transporter:</p> <ul style="list-style-type: none"> - Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out); 	Yes

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		<p>- After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition);</p> <p>The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>During field audit and document verification can be demonstrated that the transporter is under control of Marketing Asian Agri Medan and PT Rigunas Agri Utama.</p>	
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>	<p>The legal ownership of all CPO and PK are owned by PT Rigunas Agri Utama during transport.</p>	Yes
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable 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.</p>	<p>The transport for RSPO certified sustainable CPO were carried out by transporter and PK delivery was done by conveyor to Bungo Tebo KCP. CPO delivery was carried out by Transporter CV Teman Setia. This contractor was appointed, contracted and instructed by PT Rigunas Agri Utama.</p> <p>PT Rigunas Agri Utama - Bungo Tebo POM has an agreement or contract covering the outsourced process with CV Teman Setia as per "Perjanjian Pengangkutan Nomor#:01/X/TS-RAU/2019". The contract agreement has covered:</p> <ul style="list-style-type: none"> ✓ Outsourced process with transporter including right and responsibility between two parties ✓ Transporter is committed to comply with RSPO SCCS standard and following the regulation ✓ Transporter is willing to be audited by Certification Body as necessary concerning on RSPO SCCS. 	Yes

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		<p>Agreement contract has been signed by two parties both PT Rigunas Agri Utama and CV Teman Setia.</p> <p>The transporter also signed the Statement Letter which indicate that they willing to comply with RSPO SCCS standard and ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	
c.	The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	<p>PT Rigunas Agri Utama - Bungo Tebo POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" The procedure has been communicated to outsourced transporter.</p> <p>Internal control for CPO and PK delivery by contractor has made as well by:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of segel. 	Yes
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.	<p>PT Rigunas Agri Utama – Bungo Tebo POM uses RSPO Supply Chain model Mass Balance, physical visit to transporter is not necessary since PT Rigunas Agri Utama – Bungo Tebo POM has demonstrated the control of the transporter.</p>	Yes

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.	The site kept the contract of CPO and PK transporter which include name and contact detail of the contractors/transporter.	Yes
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.	PT Rigunas Agri Utama – Bungo Tebo POM are aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment.	Yes
5.6. Sales and goods out			
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"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>PT Rigunas Agri Utama - Bungo Tebo POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates: type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: (Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>Certified CPO delivered to PT Sari Dumai Sejati – Lubuk Gaung, whilst certified PK delivered to PT Rigunas Agri Utama – Bungo Tebo KCP. PT Sari Dumai Sejati hold RSPO SCC certificate CU-RSPO SCC-821960, issued by Control Union; whilst PT Rigunas Agri Utama – Bungo Tebo KCP hold RSPO SCC certificate RSPO 661647 issued by BSI. However since beginning of 2019, PT Rigunas Agri Utama was not deliver the CPO certified RSPO, latest delivery of CSPO was in August 2018 according to Delivery order:</p>	Yes

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		<ul style="list-style-type: none"> - Delivery Order (Transfer Stock) #08302/DC41/02/18 dated 3 August 2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Comodity is RSPO certified CPO; Supply chain model is Mass Balance; Quantity 500,000 kg; RSPO certificate Number RSPO 620917. - Weighbridge Card #PBTC118201272 dated 03/09/2018; seller is PT Rigunas Agri Utama – Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Delivery date is 09 August 2018; Comodity is CPO certified RSPO; Supply chain model is Mass Balance; Quantity is 28,820 kg based on DO No. 08302/DC41/02/18; Transporteris CV Teman Setia, Vehicle Number BK 9140 VN; RSPO Cert number is RSPO 620917; FFA 3.25, moisture 0.21%, dirt 0.028%. - Delivery Order #08307/DC41/02/18 dated 16/08/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati - Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 500,000 kg; Supply Chain Certificate is RSPO 620917. - Weighbridge Card #PBTC118201446 dated 03/09/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 03/09/2018; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 30,530 kg; based on DO #08307/DC41/02/18; Transporter is CV Teman Setia, BK 9347 VN; Supply Chain Certificate number RSPO 620917; FFA: 3.16%; water: 0.22%; dirt: 0.026%; Seal number 4405745 - 4405753. <p>Sampled document of Non Certified CPO delivery on 2019:</p> <ul style="list-style-type: none"> - Delivery Order (Transfer Stock) #10002/DN41/02/19 dated 10 October 2019; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Comodity is Non certified CPO; Quantity 1,000,000 kg. - Weighbridge Card #PBTC118201382 dated 17/10/2019; Seller is PT 	
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		<p>Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 17/10/2019; Commodity is CPO Non Certified; Quantity is 23,060 kg; based on DO #10002/DN41/02/19; Transporter is CV Teman Setia, BK 8360 VO; FFA: 3.63%; water: 0.22%; dirt: 0.026%; Seal number 4645900 - 4645908.</p> <p>Sampled document of CSPK Delivery:</p> <ul style="list-style-type: none"> - Delivery Form No. KCP PBT 4109 SS dated 30 September 2019, commodity: Palm Kernel, Quantity: 382,260 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. - Delivery Form No. KCP PBT 4108 SS dated 31 August 2019, commodity: Palm Kernel, Quantity: 497,430 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. - Delivery Form No. KCP PBT 4107 SS dated 31 July 2019, commodity: Palm Kernel, Quantity: 591,690 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. - Delivery Form No. KCP PBT 4106 SS dated 30 June 2019, commodity: Palm Kernel, Quantity: 378,300 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. 	
	<ul style="list-style-type: none"> • 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). 	<p>Informations are complete and presented in several document, e.g. Delivery Order and Weighbridge Card. Report of CPO and PK deliveries are documented in Laporan Harian Pabrik (Mill Daily Report), Mill Operation Report and Book Keeping Mass Balance Report.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • 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. 	<p>PT Rigunas Agri Utama - Bungo Tebo POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO).</p> <p>For example:</p> <p>CSPO</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No. TR-15bacacb-af8a for 	<p>Yes</p>

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		<p>1,000 MT CSPO Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer Wilmar Trading Pte Ltd (RSPO_PO1000002430). Confirmation has been made by Buyer on 03 October 2018. Related DO No. 06308/DC41/02/16 dated 24 June 2016, DO No. 07313/DC41/02/18 dated 19 July 2018, DO No. 08302/DC41/02/18 dated 6 August 2018.</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No. TR-66668648-fca8 for 750 MT CSPO Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer KLK Oleo (RSPO_PO1000000907). Confirmation has been made by Buyer on 17 October 2018. Related DO No. 06308/DC41/02/16 dated 24 June 2016, DO No. 08302/DC41/02/18 dated 6 August 2018, DO No. 08307/DC41/02/18 dated 16 August 2018. <p>CSPK:</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No. TR-c96f03a6-ef26 for 906.67 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 14/08/2019. Related DO/Delivery Form: No. KCP PBT 4108 SS dated 31 August 2019; - Shipping Announcement, with transaction ID No. TR-020de73e- 5400 for 467.84 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 6 August 2018. Related DO: No. 03002/DC41/14/18; 03003/DC41/14/18; 04002/DC41/14/18; 	
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5.7. Registration of transactions

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5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; 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. 	<p>PT Riginas Agri Utama – Bungo Tebo POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002913.</p>	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"> 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. 	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Rigunas Agri Utama – Bungo Tebo POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <p>CSPO</p> <ul style="list-style-type: none"> Shipping Announcement, with transaction ID No. TR-15bacacb-af8a for 1,000 MT CSPO Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer Wilmar Trading Pte Ltd (RSPO_PO1000002430). Confirmation has been made by Buyer on 03 October 2018. Related DO No. 06308/DC41/02/16 dated 24 June 2016, DO No. 07313/DC41/02/18 dated 19 July 2018, DO No. 08302/DC41/02/18 dated 6 August 2018. Shipping Announcement, with transaction ID No. TR-66668648-fca8 for 750 MT CSPO Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer KLK Oleo (RSPO_PO1000000907). Confirmation has been made by Buyer on 17 October 2018. Related DO No. 06308/DC41/02/16 dated 24 June 2016, DO No. 08302/DC41/02/18 dated 6 August 2018, DO No. 08307/DC41/02/18 dated 16 August 2018. <p>CSPK:</p>	Yes

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		<ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No. TR-c96f03a6-ef26 for 906.67 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 14/08/2019. Related DO/Delivery Form: No. KCP PBT 4108 SS dated 31 August 2019; - Shipping Announcement, with transaction ID No. TR-020de73e- 5400 for 467.84 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 6 August 2018. Related DO: No. 03002/DC41/14/18; 03003/DC41/14/18; 04002/DC41/14/18; 	
	<ul style="list-style-type: none"> • 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 document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	<p>Until this 4th annual surveillance audit (ASA4), PT Rigunas Agri Utama - Bungo Tebo POM has not sold any certified CPO or certified PK to supply chain actor beyond the refinery.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	<p>PT Rigunas Agri Utama - Bungo Tebo POM has done "Remove" in the RSPO IT Platform for CSPO sold as other scheme (ISCC), volume 23,444.55 MT of CSPO period October 2018 to September 2019 as evident in transaction ID:</p> <ul style="list-style-type: none"> - ST-TR-706e99c09-64be dated 17 October 2019, volume remove 8,255.40 MT - ST-TR-b478d58f-327c dated 17 October 2019, volume remove 4,559.36 MT - ST-TR-cf28d59c-7fb2 dated 17 October 2019, volume remove 4,545.37 MT - ST-TR-b655910b-e7e2 dated 17 October 2019, volume remove 6,084.42 MT 	<p>Yes</p>
	<ul style="list-style-type: none"> • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>PT Rigunas Agri Utama - Bungo Tebo POM is a palm oil mill which does not need to confirm any purchase of FFB.</p>	<p>N/A</p>
<p>5.8. Training</p>			

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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.	PT Rigunas Agri Utama – Bungo Tebo POM has prepared a training program to staff, who are involved in RSPO Supply Chain Certification Standard implementation. As per training program, “Program Pelatihan Environmental & Sustainability Tahun 2019 PT Rigunas Agri Utama” the RSPO supply chain and traceability refreshment training is planed on 19 May 2019. The training program is subjected to on-going review. Competency and training records of all staff involved in RSPO Supply Chain were able to be demonstrated.	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.	Latest training on “Supply Chain, Mass Balance and Traceability” performed on 25 March 2019 attended by Mill/KCP Assistant, production supervisor, production clerk, weighbridge operator and security officer. In total 9 personnel attending the training led by Mr. Sofianto (Mill/KCP KTU). Training module sighted. Sample training record seen: Ms. Dewi Anggraini (weighbridge operator), Ms. Hesti Yunralita (weighbridge operator), Ms. Juprinal (security), Sinta R (personalia clerk), Hendraja (clerk), Bayu Prasajo (production clerk), Syahrial siregar (dispatch clerk) Personnel interviewed can demonstrated understanding and implementation related RSPO Supply Chain requirement.	Yes
5.9. Record Keeping			
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.	Based on review of PT Rigunas Agri Utama – Bungo Tebo POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. Records and report verified are as follows: <ul style="list-style-type: none"> - Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2018 and 31/09/2019. - Book Keeping – Mass Balance – CPO and PK period of January – March 2019, April – June 2019, July – September 2019; 	NC # 1839713- 201910-M4 Closed on 13 November 2019 Yes

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		<ul style="list-style-type: none"> - Kartu Timbangan (Weighbridge Card) FFB; - Kartu Timbangan (Weighbridge Card) CPO; - Kartu Timbangan (Weighbridge Card) PK; <p>Sampled verified are as follows:</p> <ul style="list-style-type: none"> - Laporan Harian Produksi/Daily Production Report dated 31 September 2019: <ul style="list-style-type: none"> o FFB received today: own estate 114,310 kg; plasma 253,390 kg; outside 627,364 kg; total 995,064 kg; total certified 367,700 kg; total non certified 627,364 kg. o FFB received month todate: own estate 2,088,650 kg; plasma 7,442,398 kg; outside 13,272,589 kg; total 22,803,637 kg; total certified 9,531,048 kg; total non certified 13,272,589 kg. o FFB received year todate: own estate 17,905,223 kg; plasma 56,566,779 kg; outside 81,764,677 kg; total 156,236,679 kg; total certified 74,472,002 kg; total non certified 81,764,677 kg. - Laporan Harian Produksi/Daily Production Report dated 31 December 2018: <ul style="list-style-type: none"> o FFB received today: own estate 77,290 kg; plasma 236,671 kg; outside 463,298 kg; total 773,259 kg; total certified 309,961 kg; total non certified 463,298 kg. o FFB received month todate: own estate 2,397,546 kg; plasma 6,306,373 kg; outside 10,694,539 kg; total 19,398,458 kg; total certified 8,703,919 kg; total non certified 10,694,539 kg. o FFB received year todate: own estate 34,916,246 kg; plasma 111,075,338 kg; outside 128,343,893 kg; total 274,335,477 kg; total certified 145,991,584 kg; total non certified 128,343,893 kg. - Book Keeping Mass Balance Report, period July – September 2019: 	
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		<ul style="list-style-type: none"> ○ FFB received total: 65,619,622 kg; certified 28,237,512 kg; non-certified 37,382,110 kg. ○ FFB processed total: 65,357,132 kg; certified 28,181,984 kg; non-certified 37,175,148 kg. ○ CPO production total: 12,953,270 kg; certified 5,883,220 kg; non-certified 7,052,050 kg. ○ PK production total: 3,571,365 kg; certified 1,538,481 kg; non-certified 2,032,884 kg. ○ CPO delivery total: 12,859,850 kg; certified 6,084,420 kg; non-certified 6,775,430 kg. ○ PK delivery total: 3,508,180 kg; certified 1,471,380 kg; non-certified 2,036,800 kg. <p>Sampled record FFB receiving: Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 007409, dated 14/10/2019, Vehicle Number: BK 8978 CR, loading worker: Jamur & Juwito, source: PT RAU – Bungo Tebo Estate, Division IV Block D08L, FFB amount: 290 bunch. - Weighbridge Ticket No. PBTA119203737 dated 14/10/2019, commodity: FFB Certified; source: Bungo Tebo Estate-Afdeling IV Block D08L, amount: 290 bunch, Netto: 6,050 kg, RSPO Cert: RSPO620917, transporter: internal, vehicle number: BK 8978 CR, driver: Tamrin, batch number: 13-100-71392019-41080392. - Surat Pengantar TBS No. 006070, dated 14/10/2019, Vehicle Number: BH 8124 MF, loading worker: Dtk, Shi, source: PT RAU – Bungo Tebo Estate, Division I Block A16G, FFB amount: 985 bunch. - Weighbridge Ticket No. PBTA119203736 dated 14/10/2019, commodity: FFB Certified; source: Bungo Tebo Estate-Afdeling I Block A16G, amount: 985 bunch, Netto: 6,000 kg, RSPO Cert: RSPO620917, 	
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		<p>transporter: internal, vehicle number: BH 8124 MF, driver: Rama Dani, batch number: 13-100-71392019-41080361.</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. D00979, dated 15/10/2019, Vehicle Number: BH 9012 WU, driver: Nainggolan, source: Kelompok Tani 104 Jati Jaya Desa Jati Belarik (KUD Belarik Jaya), Kavling: 3, 1, 8, 5, FFB amount: 125 bunch. - Weighbridge Ticket No. PBTA119111570 dated 14/10/2019, commodity: FFB Certified; source: KT-104 Jati Indah, amount: 125 bunch, Block: P5104, Netto: 2,444 kg, RSPO Cert: RSPO620917, transporter: Plasma, vehicle number: BH 9012 WU, driver: Nainggolan, batch number: 13-100-34342018-41080904. - Surat Pengantar TBS No. D00086, dated 15/10/2019, Vehicle Number: BH 9907 EU, driver: Bima, source: Kelompok Tani 2 Sawit Indah Makmur Desa Pinang Belai (KUD Sawit Sumay Makmur), Kavling: 328, 329, 330, 331, FFB amount: 265 bunch. - Weighbridge Ticket No. PBTA119111569 dated 15/10/2019, commodity: FFB Certified; source: KT-002 Sawit Indah Makmur, amount: 265 bunch, Block: P1002, Netto: 5,346 kg, RSPO Cert: RSPO620917, transporter: Plasma, vehicle number: BH 9907 EU, driver: Bima, batch number: 13-100-34342018-41080901. <p>Non Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 076, dated 15/10/2019, Vehicle Number: BH 8425 WM, driver: Kancil, source: Supplier SDR, ID: ST00063, FFB amount: 70 bunch. - Weighbridge Ticket No. PBTA1191116725 dated 15/10/2019, commodity: FFB Certified; source: Supplier SDR, amount: 70 bunch, Netto: 1,302 kg, transporter: Umum/General, vehicle number: BH 8425 WM, driver: Kancil. 	
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		<ul style="list-style-type: none"> - Surat Pengantar TBS No. 075, dated 15/10/2019, Vehicle Number: BH 8340 WU, driver: Tedi, source: Supplier SDR, ID: ST00063, FFB amount: 70 bunch. - Weighbridge Ticket No. PBTA1191116725 dated 15/10/2019, commodity: FFB Certified; source: Supplier CV Asri Bersaudara, amount: 250 bunch, Netto: 6,374 kg, transporter: Umum/General, vehicle number: BH 8340 WU, driver: Tedi. <p>Sampled document of Certified CPO delivery:</p> <ul style="list-style-type: none"> - Delivery Order (Transfer Stock) #08302/DC41/02/18 dated 3 August 2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Comodity is RSPO certified CPO; Supply chain model is Mass Balance; Quantity 500,000 kg; RSPO certificate Number RSPO 620917. - Weighbridge Card #PBTC118201272 dated 03/09/2018; seller is PT Rigunas Agri Utama – Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Delivery date is 09 August 2018; Comodity is CPO certified RSPO; Supply chain model is Mass Balance; Quantity is 28,820 kg based on DO No. 08302/DC41/02/18; Transporteris CV Teman Setia, Vehicle Number BK 9140 VN; RSPO Cert number is RSPO 620917; FFA 3.25, moisture 0.21%, dirt 0.028%. - Delivery Order #08307/DC41/02/18 dated 16/08/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati - Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 500,000 kg; Supply Chain Certificate is RSPO 620917. - Weighbridge Card #PBTC118201446 dated 03/09/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 03/09/2018; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 30,530 kg; based on DO #08307/DC41/02/18; Transporter is CV Teman Setia, BK 	
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		<p>9347 VN; Supply Chain Certificate number RSPO 620917; FFA: 3.16%; water: 0.22%; dirt: 0.026%; Seal number 4405745 - 4405753.</p> <p>Sampled document of Non Certified CPO delivery on 2019:</p> <ul style="list-style-type: none"> - Delivery Order (Transfer Stock) #10002/DN41/02/19 dated 10 October 2019; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Comodity is Non certified CPO; Quantity 1,000,000 kg. - Weighbridge Card #PBTC118201382 dated 17/10/2019; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 17/10/2019; Commodity is CPO Non Certified; Quantity is 23,060 kg; based on DO #10002/DN41/02/19; Transporter is CV Teman Setia, BK 8360 VO; FFA: 3.63%; water: 0.22%; dirt: 0.026%; Seal number 4645900 - 4645908. <p>Sampled document of Certified PK Delivery:</p> <ul style="list-style-type: none"> - Delivery Form No. KCP PBT 4109 SS dated 30 September 2019, commodity: Palm Kernel, Quantity: 382,260 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. - Delivery Form No. KCP PBT 4108 SS dated 31 August 2019, commodity: Palm Kernel, Quantity: 497,430 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. - Delivery Form No. KCP PBT 4107 SS dated 31 July 2019, commodity: Palm Kernel, Quantity: 591,690 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. - Delivery Form No. KCP PBT 4106 SS dated 30 June 2019, commodity: Palm Kernel, Quantity: 378,300 kg, Seller: Bungo Tebo POM, Buyer: Kernel Crushing Plant Bungo Tebo. <p>Sampled document of Non Certified PK Delivery:</p> <ul style="list-style-type: none"> - Delivery Form No. KCP PBT 4109 N dated 30 September 2019 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - 	
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		<p>Bungo Tebo KCP; commodity is Palm Kernel; total quantity as per September 2019 is 898.845 MT; transport by Conveyor/Pipe.</p> <ul style="list-style-type: none"> - Delivery Form No. KCP PBT 4108 N dated 31 August 2019 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - Bungo Tebo KCP; commodity is Palm Kernel; total quantity as per August 2019 is 579.585 MT; transport by Conveyor/Pipe. - Delivery Form No. KCP PBT 4107 N dated 31 July 2019 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - Bungo Tebo KCP; commodity is Palm Kernel; total quantity as per July 2019 is 538.590 MT; transport by Conveyor/Pipe. <p>Non conformity raised during audit: According to delivery for of CSPK and CSPK Book Keeping Mass Balance 2019, shown that since March – October 2019, CSPK delivery to KCP Bungo Tebo was 3,727.400 MT. Whilst according to RSPO Palm trace Transaction, since 2019 (March – October 2019), confirmed that the volume of CSPK transaction was 4,509.76 MT. There was discrepancy of 782 MT of CSPK sold volume. Correction and corrective action has been made and effectively implemented, the non conformity has been Closed, see Detail of Findings section 3.4.</p>	
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.	The procedure of Traceability (AA-MPM-OP-1400.7.R6), requires that all records and reports related to traceability and book keeping are retained for a 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.	PT Rigunas Agri Utama – Bungo Tebo POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2019” consists estimate of FFB receiving from Bungo Tebo Estate, Bungo Tebo Plasma and Third Party supplier, Extraction rates, Processing capacity, working hour, utilisation.	Yes

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		<p>Estimate volume for 2020: FFB processed total 277,615 ton; CPO production total 56,330 ton; PK production total 15,269 ton; OER 20.29%; KER 5.50%.</p> <p>Estimate volume for 2019: FFB processed total 249,480 ton; CPO production total 49,448 ton; PK production total 13,851 ton; OER 19.82%; KER 5.55%.</p> <p>Estimate volume for period October 2019 to September 2020: FFB processed total 249,960 ton; FFB sustainable processed 112,430 ton; FFB non-sustainable processed 137,530 ton; CPO production total 50,713 ton; CPO sustainable produced 18,269 ton; CPO non-sustainable produced 32,444 ton; PK production total 13,748 ton; PK sustainable produced 4,674 ton; PK non-sustainable produced 9,074 ton; OER 20.30%; KER 5.50%.</p> <p>The Mill also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in "Book Keeping Mass Balance Report". Actual volume from period October 2018 to September 2019: FFB processed total 204,991 ton; FFB sustainable processed 101,443 ton; FFB non-sustainable processed 103,548 ton; CPO production total 41,122 ton; CPO sustainable produced 21,417 ton; CPO non-sustainable produced 19,705 ton; PK production total 11,424 ton; PK sustainable produced 5,651 ton; PK non-sustainable produced 5,773 ton; OER 19.61%; KER 5.55%.</p>	
5.10. Conversion factors			
5.10.1	<p>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 (www.rspo.org); 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.</p>	<p>Conversion rate is applied to provide reliable estimation of CPO and PK produced.</p> <p>For year 2020, the budget for conversion from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from own estate: 22.70% b. For FFB from plasma: 21.00% c. For FFB from third-party: 19.40% <p>For year 2020, the budget for conversion from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from own estate: 5.50% b. For FFB from plasma: 5.50% c. For FFB from third-party: 5.50% 	Yes

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		<p>For actual 2019 (data year todate 30 September 2019), actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from own estate: 22.20% b. For FFB from plasma: 20.27% c. For FFB from third-party: 18.81% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from own estate: 5.56% b. For FFB from plasma: 5.54% c. For FFB from third-party: 5.56% 	
5.10.2	<p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. Bungo Tebo POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 22 October 2019, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> d. For FFB from own estate: 23.28% e. For FFB from plasma: 21.54% f. For FFB from third-party: 19.90% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> d. For FFB from own estate: 5.68% e. For FFB from plasma: 5.68% f. For FFB from third-party: 5.68% 	Yes
5.11. Claims			
5.11.1	<p>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.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo has not made any claim regarding the use of or support of RSPO certified oil palm products. The organization has good understanding on the RSPO Rules on Market Communications and Claims.</p>	Yes

General corporate communications			
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.	PT Rigunas Agri Utama is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com .	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.	Corporate communication in Asian Agri website: a. Display its RSPO membership status: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. b. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1 st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." d. State the member's history with regards to the RSPO: Yes. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. e. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo.	Yes
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.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement are clear and did not	Yes

	as to the certified content of oil palm products in the member's own products.	mislead consumers or other stakeholders as to the certified content of oil palm products in their own products.	
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.	No, the Asian Agri website did not display the RSPO Corporate Logo.	Yes
Business to business communications			
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.	PT Rigunas Agri Utama – Bungo Tebo POM stated in sales documents, e.g. Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model MB.	Yes
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.	It was verified that when selling certified oil palm product, PT Rigunas Agri Utama – Bungo Tebo POM stated the supply chain model and certificate number, e.g. in Delivery Order and Weighbridge Card.	Yes
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: f. 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.	PT Rigunas Agri Utama – Bungo Tebo POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK.	N/A

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	g. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
5.4	<p>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.</p> <p>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.</p>	PT Rigunas Agri Utama – Bungo Tebo POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	N/A
Business to consumer communication			
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.	PT Rigunas Agri Utama – Bungo Tebo POM is an RSPO certificate holder with certificate number RSPO 620917 valid until 2 December 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	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.	PT Rigunas Agri Utama – Bungo Tebo POM is an RSPO certificate holder with certificate number RSPO 620917 valid until 2 December 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No RSPO trademark and/or RSPO label claims are used. 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.	PT Rigunas Agri Utama – Bungo Tebo POM sold its oil palm product in bulk, no product pack are used. Not applicable.	N/A

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6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT Rigunas Agri Utama – Bungo Tebo POM communication has not stated information about the claimant’s RSPO membership status.	N/A
6.5	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	The certification of PT Rigunas Agri Utama – Bungo Tebo POM suppliers, fall under PT Rigunas Agri Utama itself, it was the company estate (Bungo Tebo Estate) and scheme smallholder (Plasma Bungo Tebo). The CH communication has not mentioned to consumers information about their suppliers’ RSPO membership status.	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.	The site sold its oil palm product in bulk, up to this moment, PT Rigunas Agri Utama – Bungo Tebo POM has not use RSPO trademark.	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.	Up to this moment, PT Rigunas Agri Utama – Bungo Tebo POM has not use other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	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 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	PT Rigunas Agri Utama – Bungo Tebo POM is not a retailer or food service company. Not applicable.	N/A

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	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 www.rspo.org.		
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Based on document review, there has been no complaint from stakeholder related to certified CPO or PK from PT Rigunas Agri Utama – Bungo Tebo POM. In the case of any complaint, the mill provided procedure AA-GL-5.08-R1 related to information request from any stakeholders to resolving stakeholder complaints.	Yes
5.13. Management Review			
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.	PT Rigunas Agri Utama – Bungo Tebo POM has Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R1). The management review and internal audit planned once a year at minimum, considering the critical area.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	The latest management review of PT. Inti Indosawit Subur – Muara Bulian POM carried out on 1 July 2019 attended by mill manager, technical controller, administration assistant. The organization shows issues discussed during management review. Minute of management review meeting and attendance list were available. The management review inputs include information as follow: The management review inputs include information on: <ul style="list-style-type: none"> - The result of audits: based on the latest Internal audit of PT Rigunas Agri Utama – Bungo Tebo POM carried out on 8 – 9 January 2019 by Mr. Rico Santoso Pakpahan, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance. - Customer feedback: up to this moments there is no customer complaint; - Process performance and product conformity: Bungo Tebo POM has defined agenda for Visit Engineering to assess mill performance annually, 	NC# 1839713-201910-M2 Closed on 13 November 2019 Yes

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		<p>if there is input from VE visit, CAP will be determined and implemented accordingly; Bungo Tebo POM get support from several department related to product conformity; R&D Department periodically monitor production result of POM and KCP and give input and recommendation as well; Bungo Tebo POM periodically conducted sample test to ensure product quality prior to be sent to buyer;</p> <ul style="list-style-type: none"> - Status of corrective and preventive action: followed up through regular traceability and mass balance refreshment training annually; coordination meeting scheduled in October 2019 to ensure implementation of RSPO SCC requirements; - Changes that could affect the management system: no changes; - Recommendation for improvement: Made and install cover in kernel conveyor under hydrocyclone no.1. 	
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"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>PT. Rigunas Agri Utama – Bungo Tebo POM has conducted management review dated 1 July 2019. The management review output indicates decision and actions related to:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of management system and its process: installation of pneumatic valve on sterilizer compressor and engine room. - Resource needed: to appoint PIC responsible for RSPO SCCS. 	<p>NC# 1839713- 201910-M3 Closed on 13 November 2019 Yes</p>

Appendix E: CPO Mill Supply Chain Assessment Report (Module *E* - CPO Mills: *Mass Balance*)

E.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	PT Rigunas Agri Utama – Bungo Tebo POM holds current RSPO P&C Certificate No. RSPO 620917. In the current certificate, PT Rigunas Agri Utama – Bungo Tebo POM uses Mass Balance supply chain system. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Bungo Tebo Estate) and scheme smallholder (Plasma Bungo Tebo). The other supply base, were come from third party suppliers as non-certified FFB source.	Yes
E.2 Explanation			
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the 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 projection for certified FFB and production of certified CPO and PK in PT Rigunas Agri Utama – Bungo Tebo POM has been recorded in BSI’s public summary report and registered in RSPO IT Platform. Estimate volume for period December 2019 – November 2020: FFB: 129,109 MT CPO: 27,483 MT OER: 21.29 % PK: 7,101 MT KER: 5.50 %	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through	PT Rigunas Agri Utama – Bungo Tebo POM has met registration and reporting requirement as it has been registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000002913.	

	the RSPO supply chain managing organization (RSPO IT platform).		
E.3 Documented procedures			
E.3.1	<p>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:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>During this 4th Annual Surveillance Assessment (ASA4) PT Rigunas Agri Utama - Bungo Tebo POM can demonstrates:</p> <ol style="list-style-type: none"> 1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Bungo Tebo Estate and Bungo Tebo Plasma, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. 2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. 3. SOP of Palm Oil Mill operation: <ol style="list-style-type: none"> a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station); b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer); c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation); d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station); e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification); f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation); 	Yes

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		<ul style="list-style-type: none"> g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station); h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler; i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room; j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment; k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium; l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment); m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch); n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair). 	
	b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager, Mr. Tatar Simanjuntak, was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	Yes
E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBS.	The Mill has had documented procedures for receiving and processing of Certified and Non-certified FFBS in form of SOP AA-MPM-OP-1400.17-R6 "Traceability" and SOP for FFB Receiving Station (AA-MPM-OP-1400.02-R2). The Mill uses RSPO Supply Chain model Mass Balance, therefore does not required to separated receiving and processing of certified and non-certified FFB.	Yes
E.4 Purchasing and goods in			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBS received.	Responsible Person is able to demonstrate mechanism to verify and documented the volumes of Certified and Non-certified FFBS received, which contains:	Yes

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		<ul style="list-style-type: none"> • Name of Estate, Division and Block (Sources of certified FFB) • Date of harvesting • Certificate Number <p>Document verified, i.e.:</p> <ul style="list-style-type: none"> - Laporan Harian Produksi/Daily Production Report dated 31 September 2019: <ul style="list-style-type: none"> o FFB received today: own estate 114,310 kg; plasma 253,390 kg; outside 627,364 kg; total 995,064 kg; total certified 367,700 kg; total non certified 627,364 kg. o FFB received month todate: own estate 2,088,650 kg; plasma 7,442,398 kg; outside 13,272,589 kg; total 22,803,637 kg; total certified 9,531,048 kg; total non certified 13,272,589 kg. o FFB received year todate: own estate 17,905,223 kg; plasma 56,566,779 kg; outside 81,764,677 kg; total 156,236,679 kg; total certified 74,472,002 kg; total non certified 81,764,677 kg. - Laporan Harian Produksi/Daily Production Report dated 31 December 2018: <ul style="list-style-type: none"> o FFB received today: own estate 77,290 kg; plasma 236,671 kg; outside 463,298 kg; total 773,259 kg; total certified 309,961 kg; total non certified 463,298 kg. o FFB received month todate: own estate 2,397,546 kg; plasma 6,306,373 kg; outside 10,694,539 kg; total 19,398,458 kg; total certified 8,703,919 kg; total non certified 10,694,539 kg. o FFB received year todate: own estate 34,916,246 kg; plasma 111,075,338 kg; outside 128,343,893 kg; total 274,335,477 kg; total certified 145,991,584 kg; total non certified 128,343,893 kg. - Book Keeping Mass Balance Report, period July – September 2019: <ul style="list-style-type: none"> o FFB received total: 65,619,622 kg; certified 28,237,512 kg; non-certified 37,382,110 kg. 	
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		<ul style="list-style-type: none"> ○ FFB processed total: 65,357,132 kg; certified 28,181,984 kg; non-certified 37,175,148 kg. ○ CPO production total: 12,953,270 kg; certified 5,883,220 kg; non-certified 7,052,050 kg. ○ PK production total: 3,571,365 kg; certified 1,538,481 kg; non-certified 2,032,884 kg. ○ CPO delivery total: 12,859,850 kg; certified 6,084,420 kg; non-certified 6,775,430 kg. ○ PK delivery total: 3,508,180 kg; certified 1,471,380 kg; non-certified 2,036,800 kg. <p>Sampled record FFB receiving: Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 007409, dated 14/10/2019, Vehicle Number: BK 8978 CR, loading worker: Jamur & Juwito, source: PT RAU – Bungo Tebo Estate, Division IV Block D08L, FFB amount: 290 bunch. - Weighbridge Ticket No. PBTA119203737 dated 14/10/2019, commodity: FFB Certified; source: Bungo Tebo Estate-Afdeling IV Block D08L, amount: 290 bunch, Netto: 6,050 kg, RSPO Cert: RSPO620917, transporter: internal, vehicle number: BK 8978 CR, driver: Tamrin, batch number: 13-100-71392019-41080392. - Surat Pengantar TBS No. 006070, dated 14/10/2019, Vehicle Number: BH 8124 MF, loading worker: Dtk, Shi, source: PT RAU – Bungo Tebo Estate, Division I Block A16G, FFB amount: 985 bunch. - Weighbridge Ticket No. PBTA119203736 dated 14/10/2019, commodity: FFB Certified; source: Bungo Tebo Estate-Afdeling I Block A16G, amount: 985 bunch, Netto: 6,000 kg, RSPO Cert: RSPO620917, transporter: internal, vehicle number: BH 8124 MF, driver: Rama Dani, batch number: 13-100-71392019-41080361. 	
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		<ul style="list-style-type: none"> - Surat Pengantar TBS No. D00979, dated 15/10/2019, Vehicle Number: BH 9012 WU, driver: Nainggolan, source: Kelompok Tani 104 Jati Jaya Desa Jati Belarik (KUD Belarik Jaya), Kavling: 3, 1, 8, 5, FFB amount: 125 bunch. - Weighbridge Ticket No. PBTA119111570 dated 14/10/2019, commodity: FFB Certified; source: KT-104 Jati Indah, amount: 125 bunch, Block: P5104, Netto: 2,444 kg, RSPO Cert: RSPO620917, transporter: Plasma, vehicle number: BH 9012 WU, driver: Nainggolan, batch number: 13-100-34342018-41080904. - Surat Pengantar TBS No. D00086, dated 15/10/2019, Vehicle Number: BH 9907 EU, driver: Bima, source: Kelompok Tani 2 Sawit Indah Makmur Desa Pinang Belai (KUD Sawit Sumay Makmur), Kavling: 328, 329, 330, 331, FFB amount: 265 bunch. - Weighbridge Ticket No. PBTA119111569 dated 15/10/2019, commodity: FFB Certified; source: KT-002 Sawit Indah Makmur, amount: 265 bunch, Block: P1002, Netto: 5,346 kg, RSPO Cert: RSPO620917, transporter: Plasma, vehicle number: BH 9907 EU, driver: Bima, batch number: 13-100-34342018-41080901. <p>Non Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 076, dated 15/10/2019, Vehicle Number: BH 8425 WM, driver: Kancil, source: Supplier SDR, ID: ST00063, FFB amount: 70 bunch. - Weighbridge Ticket No. PBTA1191116725 dated 15/10/2019, commodity: FFB Certified; source: Supplier SDR, amount: 70 bunch, Netto: 1,302 kg, transporter: Umum/General, vehicle number: BH 8425 WM, driver: Kancil. - Surat Pengantar TBS No. 075, dated 15/10/2019, Vehicle Number: BH 8340 WU, driver: Tedi, source: Supplier SDR, ID: ST00063, FFB amount: 70 bunch. <p>Weighbridge Ticket No. PBTA1191116725 dated 15/10/2019, commodity: FFB Certified; source: Supplier CV Asri Bersaudara, amount: 250 bunch, Netto: 6,374 kg, transporter: Umum/General, vehicle number: BH 8340 WU, driver:</p>	
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		Tedi.	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. Until this 4 th annual surveillance audit, there is no overproduction happened.	Yes
E.5 Record keeping			
E.5.1	a. 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 and / or three-monthly basis by RSPO.	PT Rigunas Agri Utama – Bungo Tebo POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three-monthly basis, as shown in Book Keeping Mass Balance Report. Three monthly reports was generated from weighbridge card, summarized daily in mill daily report, summarized monthly in Mill Operation Summary, then summarized in Book Keeping Mass Balance Report. Records and report verified are as follows: <ul style="list-style-type: none"> • Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2018 and 30/09/2019. • Book Keeping – Mass Balance – CPO and PK period of January – March 2019, April – June 2019, July – September 2019; • Kartu Timbangan (Weighbridge Card) FFB; • Kartu Timbangan (Weighbridge Card) CPO; • Kartu Timbangan (Weighbridge Card) PK; 	Yes
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. The management of PT Rigunas Agri Utama – Bungo Tebo POM has mechanism and knowledge that all volumes of CPO and PK delivered are deducted from the material accounting system. All volume of CPO and PK are deducted from positive stock.	Yes

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	<p>c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM only deliver certified CPO and PK sales from a positive stock. The volume of certified CPO and PK are deducted on three-monthly basis. Audit team verified there was no short-selling and/or negative stock at the end of three-monthly period.</p>	<p>NC# 1839713- 201910-M5 Closed on 13 November 2019 Yes</p>
<p>E.5.2</p>	<p>In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. The management of PT Rigunas Agri Utama – Bungo Tebo POM has mechanism and knowledge that all volumes of CPO and PK delivered are deducted from the material accounting system. All volume of CPO and PK are deducted from positive stock.</p>	

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	September 2018	14,613.32	9,378.53	23,991.85
2	October 2018	14,713.31	12,911.40	27,624.71
3	November 2018	13,062.23	11,465.65	24,527.88
4	December 2018	8,809.34	10,829.61	19,638.95
5	January 2019	7,103.85	10,403.84	17,507.68
6	February 2019	6,838.67	7,305.54	14,144.22
7	March 2019	7,324.73	3,877.38	11,202.11
8	April 2019	6,353.65	5,254.63	11,608.28
9	May 2019	8,841.60	9,315.51	18,157.11
10	June 2019	9,627.70	8,091.69	17,719.38
11	July 2019	10,329.15	12,050.54	22,379.69
12	August 2019	8,438.68	12,042.24	20,480.92
13	September 2019	9,414.16	13,082.37	22,496.53
Total		125,470.39	126,008.93	251,479.32

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	September 2018	3,125.80	786.28
2	October 2018	3,260.50	820.73
3	November 2018	2,835.78	740.00
4	December 2018	1,954.22	494.53
5	January 2019	1,546.67	416.63
6	February 2019	1,422.39	403.07
7	March 2019	1,524.67	419.47
8	April 2019	1,315.42	331.72
9	May 2019	1,768.51	480.64
10	June 2019	1,935.81	526.22
11	July 2019	2,089.49	561.32
12	August 2019	1,764.12	455.93

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13	September 2019	2,029.62	521.23
Total		26,573.00	6,957.77

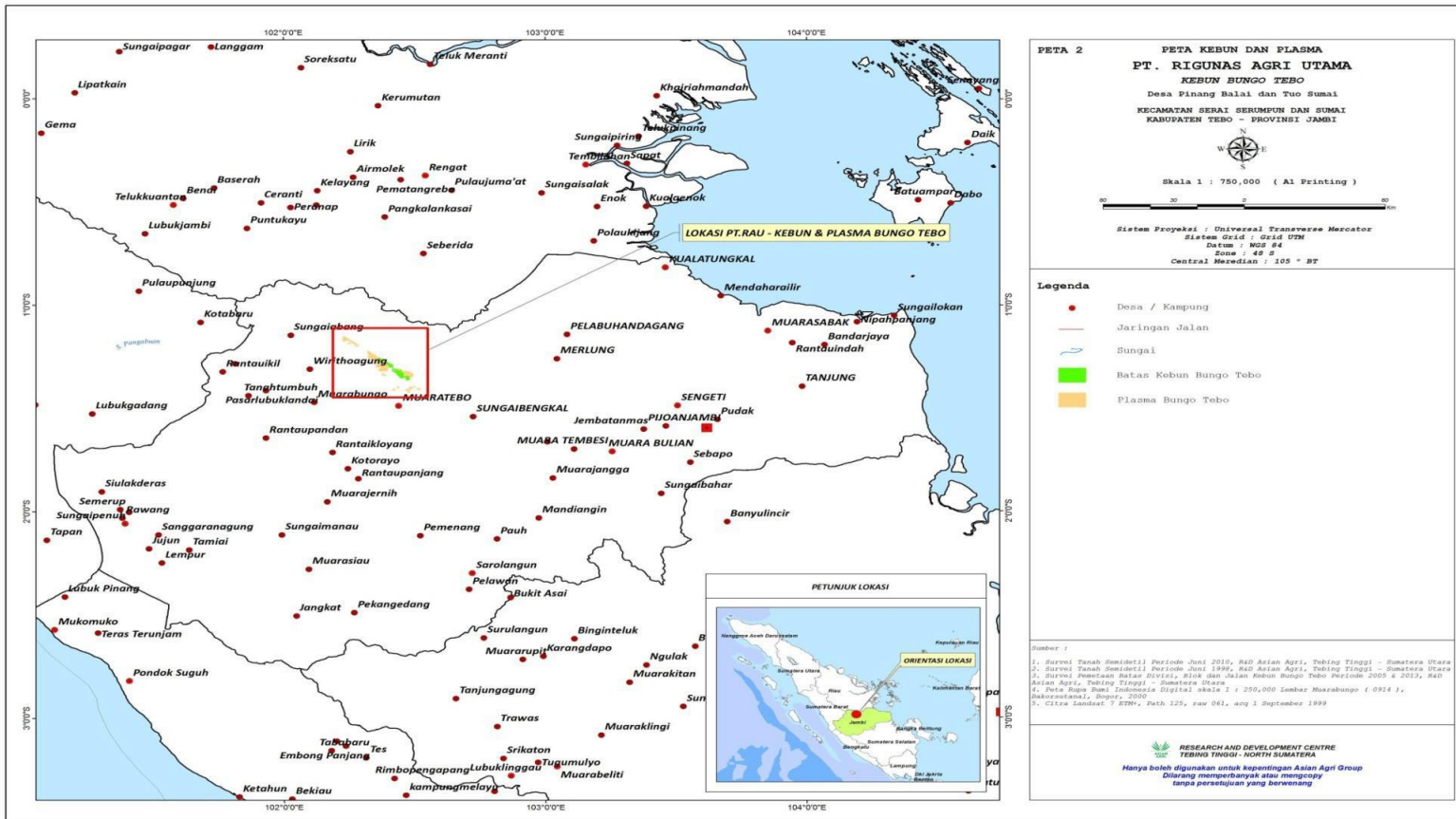
C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (Sept 2018 – Sept 2019)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	KCP Bungo Tebo PT Rigunas Agri Utama	TR-a11883ea-658b	-	1,444.45
2	KCP Bungo Tebo PT Rigunas Agri Utama	TR-c96f03a6-ef26	-	906.67
3	KCP Bungo Tebo PT Rigunas Agri Utama	TR-68773e3b-7c8f	-	243.22
4	KCP Bungo Tebo PT Rigunas Agri Utama	TR-ee47eb17-213d	-	652.8
5	KCP Bungo Tebo PT Rigunas Agri Utama	TR-2b3153ef-babc	-	453.84
6	KCP Bungo Tebo PT Rigunas Agri Utama	TR-fb85f0c0-d211	-	611.11
Total				4,312.09

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (Oct 2018 – Sept 2019)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Classified	ISCC	23,445.55	0

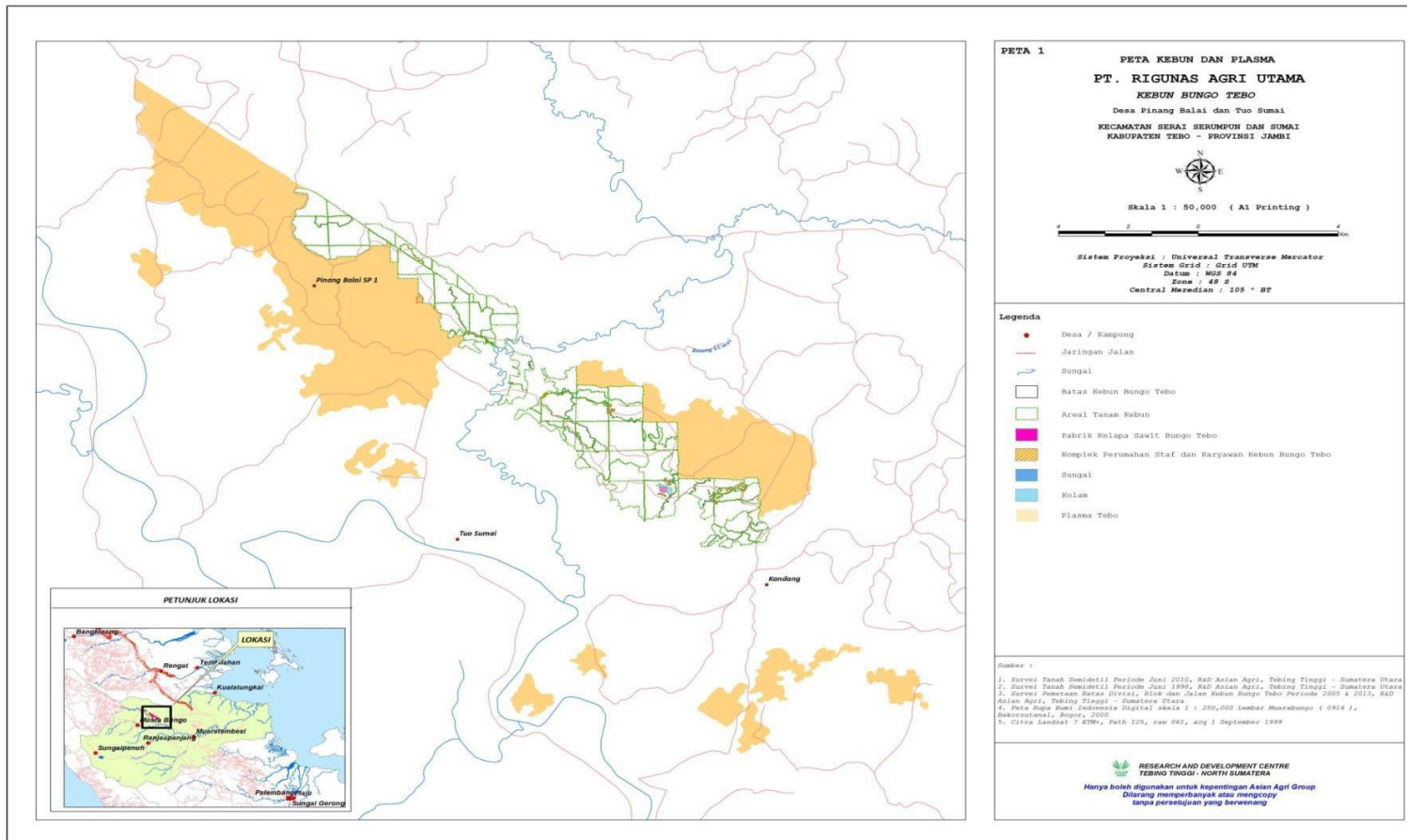
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (Oct 2018 – Sept 2019)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
n/a	NIL			

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (Oct 2018 – Sept 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
n/a	NIL		

Appendix F: Location Map of Certification Unit and Supply bases



Appendix G: Estate Field Map



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

No.	Hampanan	Kavling	Name	SHM No.	Year	Area (Ha)
KUD Sawit Keluarga Sejahtera						
Desa Bungo Tanjung						
1	52	960	Samsudin	600	2004	1.949
2	52	961	Buhari Las	377	2002	20.040
3	52	989	H. Solahuddin	368	2002	2.041
4	52	990	Zauwiyah	66	2002	2.014
				Sub Total		26.044
KUD Sawit Makmur Bersama						
Desa Bukit Pamuatan						
1	75	1635	Ruslan / Yusuf	394	2004	2.007
2	75	1640	Jumadi / Sukardi	581	2004	1.976
3	76	1490	Saliman /Imam	428	2004	1.938
4	76	1491	Satino	429	2004	1.924
5	77	1643	Munir / Mujamil	544	2004	1.976
6	77	1681	Suparno	579	2004	1.988
7	77	1684	Sajim	395	2004	2.069
8	77	1580	M. Daud	547	2004	1.937
9	77	1590	Dijah Tanjung	542	2004	1.997
10	77	1591	Paijo	486	2004	1.947
11	79	1529	Mulyadi K.	596	2004	1.991
12	79	1530	Marno	434	2004	1.947
13	81	1703	Mudriah	485	2004	1.951
14	81	1704	Undang Sofian	513	2004	2.284
				Sub Total		27.932
KUD Barokah						
Desa Teluk Kasai Rambahan						
1	16	475	Baihaki	947	2002	2.019
2	16	485	M. Nasir / Edi	858	2002	2.113
3	17	456	Edi Susanto	898	2002	1.929
4	17	457	Patmawati / Muhadi	862	2002	2.053
5	22	434	Ngadiran	868	2002	2.390
6	22	562	Safi'i	862	2002	2.053
7	22	668	Jumianto / Madi	899	2002	1.929
8	22	669	M. Kasim K.	854	2002	2.219
				Sub Total		16.705
KUD Sawit Tanduk Perkasa						
Desa Sako Makmur						
1	54	1454	Mahyudin	385	2004	2.264
2	54	1457	Mardani / Agus	375	2004	2.047
3	56	1420	Zuhdi Z. / Saman	366	2004	2.079
4	56	1427	Juri Jubai / Tomi	349	2004	2.048
5	56	1429	M. Ali / Iman R.	292	2004	1.835
6	56	1437	Ira AN / Sugianto	293	2004	2.337
7	58	1360	Tarmizi Has / Suprat	320	2004	2.036
8	58	1361	Makmun RTL / Latipah	391	2004	2.000
9	58	1362	Arman Dulika / Nurhamid	304	2004	2.796
10	58	1369	Heri / Pariyanto	328	2004	2.029

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11	58	1375	Bahtiar KC. / Joko	338	2004	2.288
12	58	1376	Nabhan / Suhaimi	331	2004	2.722
13	58	1383	Swandi IT / Suhaimi / Rohman	339	2004	2.281
14	71	1298	Sahril / Wediyanto	340	2004	2.277
15	71	1299	Habli / Sugeng	342	2004	2.221
16	60	1300	Yusuf A. /Sugianto	344	2004	2.157
17	69	1275	Sayuti	382	2004	2.074
18	69	1276	Amran AL. / Sayuti / Sularno	383	2004	2.264
			Sub Total			39.755
KUD Sawit Sumay Makmur						
Desa Pinang Balai						
1	2	328	Mujar	785	2002	1.938
2	2	329	Suyud / Dedi	390	1999	1.880
3	2	330	Wahyudi /Saroni	380	1999	1.962
4	3	278	Marsono / Dedi	383	1999	1.929
5	3	279	Kusmanto	410	1999	1.954
6	3	280	J. Sinambela	542	1999	2.063
7	5	256	Lijah A.	536	1999	2.346
8	5	257	Sukadi	691	2000	1.958
9	5	258	ABD Muin B	543	1999	2.055
10	6	407	Naslikah	434	1999	1.878
11	6	408	Karyono	418	2006	1.920
12	6	409	Mahidin	772	2002	2.008
13	10	125	Suardi	760	2002	2.246
14	10	150	Bedul Fahta	761	2002	2.228
15	10	151	Karman	780	2002	1.978
16	10	152	Jedawi	783	2002	1.970
17	12	68	Jumangan	731	2002	1.942
18	12	69	Misnan	345	2002	2.005
19	12	70	Rizal Sinaga	1028	2002	1.968
20	12	71	Khairul Anom / Heri	712	2002	2.300
			Sub Total			40.528
			Total			150.963

Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
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